Tom Larsen
317-326-2442

GE Electrical Distribution & Control

Specialty Transformer Operation
General Electric Company
P.O. Box 1701, Fort Wayne, IN 46801
(219) 428-2000

June 4, 1993

Ms. Francene Harris
U.S. Environmental Protection Agency
Region V
RCRA Enforcement Branch
77 West Jackson Blvd.
Chicago IL 60604-3590

IND 005 448 683

Dear Ms. Harris:

As you know, we recently received a copy of the Preliminary Assessment/Visual Site Inspection (PA/VSI) report prepared by Resource Applications, Inc. for GE's Specialty Transformer Operation in Fort Wayne, Indiana (IND 004 557 815). As we read through the document, we noticed a few issues which require clarification or for which we can supply additional information that might help you better understand our operations. We recognize that you will be using the PA/VSI report to make decisions concerning the need for corrective action at the facility and thought you might appreciate our comments.

Our overall reaction to the report is that the authors/inspectors did a very creditable job representing our operation. We are disappointed, though, that you elected not to include their conclusions in our copy of the report. While the overview appears to be reasonably accurate, there are some technical errors which indicate a less than complete understanding of our operations. This is not a criticism, since we all recognize that no one can be an expert on all facets of every different type of industry. Our concern is that any lack of understanding could lead to controversial conclusions. Therefore, in formulating our reply we have addressed just those issues which we suspect may have had an influence on Resource Applications' conclusions.

- **Introduction.** We were confused about the specific regulatory authority that governs the Preliminary Assessment and Visual Site Inspection (PA/VSI) activities conducted at our facility. To our knowledge, the terms "PA" and "VSI" do not appear as a single, consolidated activity under either the CERCLA or RCRA Corrective Action program. According to OSWER Directive #9932.0 ("The Environmental Priorities Initiative: An Introduction to Identifying and Addressing Environmental Problems"), the Environmental Priorities Initiative (EPI) is a prioritization process. Specifically, this guidance suggests that, under the EPI process, a facility should undergo a CERCLA PA after which the priority for further action should be determined by applying the Hazard Ranking System. Sites that do not meet the cutoff for listing on the National Priority List (NPL) would then receive a full CERCLA Site Investigation (SI) plus a RCRA Facility Assessment (RFA). From the information provided in this report, it appears as though our facility has gone through portions of both the RCRA and CERCLA processes, but that neither of these assessment procedures has been completed according to the standards in the appropriate guidance. Consequently, we assume that either the PA/VSI is an interim report that will be amended after a formal RFA is conducted, or you have determined through the EPI process that our facility does not require further action under RCRA Corrective Action or CERCLA.

- **Introduction, page 1, third paragraph.** The definition of a Solid Waste Management Unit (SWMU) provided in the report is not consistent with the definition given in other relevant EPA guidance related to the RCRA Corrective Action program. Specifically, we are concerned that the definition in the report implies that "hazardous constituents might migrate" from all SWMUs listed in this report. This is clearly not the case.

- **Introduction, page 2, first paragraph.** The term "Area of Concern" (AOC) has no regulatory significance. To our knowledge, the term does not appear in the Corrective Action statute (HSWA 3008(h)), the proposed Subpart S rule, the National Contingency Plan, or any guidance documents related to CERCLA or the RCRA Corrective Action program. More importantly, EPA has no authority under either of these programs to regulate potential future releases as implied by the definition of an AOC provided in the report.

- **Introduction, page 3, first paragraph.** We are concerned that the PA/VSI report was prepared approximately nine months after the PA and VSI had been completed. However, since we were not provided a copy of the conclusions and recommendations for further action, we cannot determine the full impact of this situation.

- **Page 8, second paragraph, third sentence.** It is important to note that all of these "disposal" methods occur off-site. The facility has no on-site landfilling, incineration, fuel blending, or commercial reclamation.

- **Page 14, last paragraph.** It is important to note that other wastes generated from the plating line are also shipped to Technic, Inc. These include resin beads, cotton nickel filters, contaminated rags, gloves, and liquid samples of the plating solution.

- **History of Documented Releases, page 16, second paragraph.** It is important to note that the release described in this paragraph was of a commercial product, methyl ethyl ketone peroxide, which is listed as a hazardous waste due to its reactivity. Consequently, the hazardous properties of the material would have been eliminated in the process of dilution. Further, since the material was not a waste, the release is not subject to EPA's RCRA Corrective Action authorities. It may also be of interest to point out that this material is available to the general public as a component of such products as auto-body and wood fillers.

- **Page 17, second paragraph, second sentence.** The statement that the constituents detected in the soil samples during closure are "contaminants" is an opinion and not supported by the facts in every case. In particular, the metals detected in the soil analyses are naturally-occurring substances and were all found within the normal range of concentrations for soil as reported in the scientific literature.

- **Page 18, first paragraph, fifth sentence.** It is important to note that the suggestion to prepare a risk assessment was made only after IDEM refused to accept the EPA health-based action levels as the appropriate standards for this closure. GE continues to believe that the soils underlying this unit do not pose a threat to human health and the environment, based on the levels of constituents reported. As discussed above, many of these constituents are found at similar levels in natural soils. The others were all below levels considered by EPA to be safe for human consumption.

- **Flood Plain and Surface Water, page 19.** It is important to note that surface runoff from the industrial portions of the facility flows to the municipal wastewater treatment plant through the combined sewer system. The only exceptions are two small areas north of Buildings 36 and 26A and three small areas east of Building 19, 20 and 25 (indicated in red on the attached figure). Therefore, the discussion of nearby surface water bodies is irrelevant, since releases from chemical and waste management activities at the facility could not migrate to these features. (This comment also applies to the first paragraph at the top of page 23.)

- **Page 22, fourth paragraph, last sentence.** It is not clear to us how "significant water users could potentially alter ground water flow direction" if there are "no significant water users within 1 mile of the facility."

- **Page 23, second paragraph, second sentence.** It is not clear to us how the authors characterize the down-gradient well as potable if the use of the well is not known.

- **SWMU 1, page 24, Unit Description.** The discussion confuses the active less-than-90-day storage area and the greater-than-90-day storage area undergoing closure and implies that the areas are different which is not true. The permitted greater-than-90-day area is approximately 14 feet X 18 feet and is currently used for less-than-90-day storage as proposed in the approved closure plan.

- **Conclusions and Recommendations, page 32.** As discussed in a previous comment, this section was not included in our copy of the report. We object to EPA's decision to withhold this information from us on the grounds that the facility is not currently the object of an enforcement action. Further, this information has routinely been provided in similar reports produced for other General Electric facilities across the country. Finally, since nearly a year passed between completion of the PA and VSI and the date of the report, we question the authors' ability to produce an accurate report with appropriate conclusions. Consequently, we strongly recommend that we be given an opportunity to comment on the report in its entirety, if for no other reason than to reduce the potential for future appeals based on deficiencies in the report that resulted from the extended time to prepare the document.

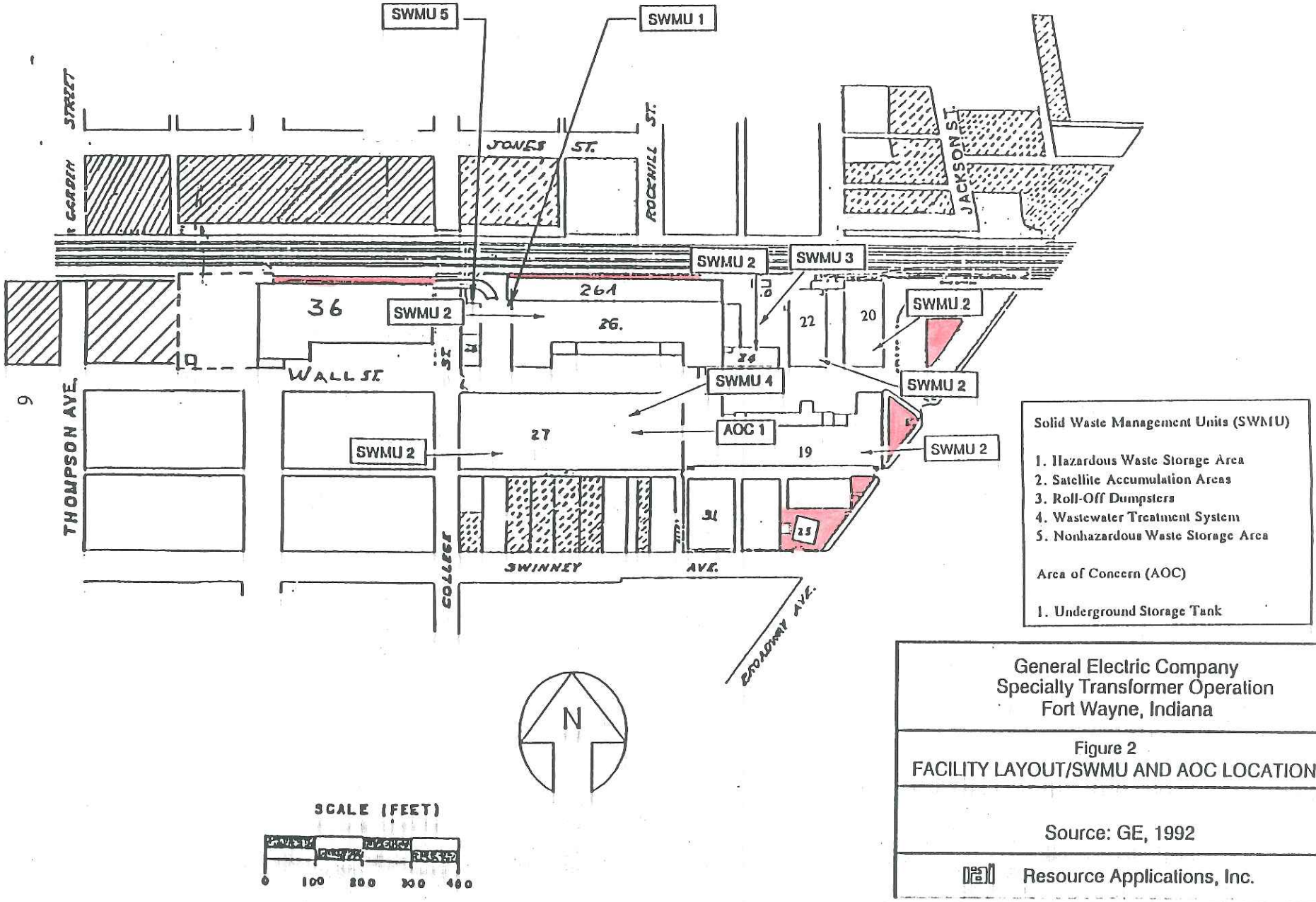
- o **AOC 1, page 30.** Notwithstanding our previous comment regarding the regulatory significance of the term "Area of Concern" we are confused as to why this particular tank was determined to qualify as an AOC. According to the definition of AOC on page two of the PA/VSI report, a release must have occurred or be suspected to have occurred for an AOC to exist. We know of no information with respect to the underground tank that would indicate a release has occurred. We object to the implication that the absence of integrity testing data is evidence of a release. Further, since the unit did not contain a RCRA solid waste, any releases would be exempt from EPA's RCRA Corrective Action authorities in any case. In addition, the only hazardous waste previously contained in the tank was butanol which is listed due to ignitability; no hazardous constituents were managed in this tank.

Thank you for giving us the opportunity to review and comment on the PA/VSI report for our facility. We hope that you will find our comments helpful. If you have any questions, please feel free to contact me at (219) 439-2845.

Sincerely,

Francis M. Harter, Jr.

Francis M. Harter, Jr., P.E.
Environmental, Health and Safety Specialist



General Electric Company
Specially Transformer Operation
Fort Wayne, Indiana

Figure 2
FACILITY LAYOUT/SWMU AND AOC LOCATIONS

Source: GE, 1992

Resource Applications, Inc.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

PA/VSI

REPLY TO THE ATTENTION OF:

HRE-8J

March 15, 1993

Mr. Tom Cooper
WRC, Inc.
4101 Edison Lake Parkway, Suite 160
Mishawaka, Indiana 46545

Re: Visual Site Inspection
Formco, Inc.
(formerly Taylor Products)
Elkhart, Indiana
ID No. 005 448 139

Dear Mr. Cooper:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for March 16, 1993 at 12:00 p.m. The inspection team will consist of Lorraine Morris and Peter Lynch of PRC Environmental Management, Inc., a contractor for the

U.S. EPA. Representatives of the Indiana Department of Environmental Management may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

Francene D. Harris for

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Tom Linson, IDEM

ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows:

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

PRC requests that, if available, the following facility information be provided during the VSI:

1. Two copies of a detailed map of the facility
2. Facility history, including dates of operation, ownership changes, and production processes
3. Current facility operations
4. Processes that generate waste that is treated, stored, or disposed of at the facility
5. Records of disposal of wastes generated at the facility (manifests, annual reports, etc...)
6. Security at the facility
7. Information regarding geology and the uses of ground water and surface water in the area
8. Permits (air, NPDES, etc...) the facility currently holds or has held in the past and documentation of any permit violations that may have occurred
9. Records of any spills that may have occurred at the facility
10. Descriptive operational information (location, dimensions, capacity, materials of construction, etc...), dates of start-up and closure, wastes managed, release controls, and release history for each SWMU

U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006

TES 9

Technical Enforcement Support at Hazardous Waste Sites Zone III Regions 5,6, and 7

prc
PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

GENERAL ELECTRIC COMPANY TAYLOR STREET FACILITY FORT WAYNE, IN IND 005 448 683

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	R05032
EPA Region	:	5
Site No.	:	IND 005 448 683
Date Prepared	:	March 23, 1992
Contract No.	:	68-W9-0006
PRC No.	:	209-R05032-IN11
Prepared by	:	Resource Applications, Inc.
Principal Investigator	:	(Scott R. Tajak)
Telephone	:	(312) 332-2230
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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EXECUTIVE SUMMARY

Resource Applications, Inc. (RAI) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the General Electric Company (GE) Taylor Street facility in Fort Wayne, IN. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from the SWMUs and AOCs identified.

The GE plant has three separate manufacturing operations: (1) the Motor Manufacturing Department, (2) the Wire Mill, and (3) the Aircraft Control Systems Department. The Motor Manufacturing Department makes fractional and integral horsepower motors. The Wire Mill draws, rolls, and coats wire for use in magnet motors. The Aircraft Control Systems Department assembles aircraft components. The facility covers 57 acres and has been in operation since 1945. The primary wastes generated at GE are waste caustic stripping solution, spent liquid enamels and solid enamel wastes, spent fluorocarbon solvent and fluorocarbon-contaminated wipes, spent solvents, spent thinners, spent 1,1,1-trichloroethane (TCA), spent trichlorotrifluorothane (Genesolv), spent aluminum and copper drawing compound, and grinding sludge.

Currently GE is regulated as a large quantity generator. Prior to January 14, 1991 it was also classified as a treatment/storage/disposal (TSD) facility. Closure was approved on this date for GE's greater than 90-day Former Hazardous Waste Storage Area (SWMU 5).

The facility is surrounded by a chain-link fence. Access to the plant occurs at the guard post. The facility has a security team which works 24 hours a day. The facility also has a fireman on duty at all times as part of the security team.

The nearest residences are a less than a quarter mile to the east of the facility. The nearest school is approximately a half mile south of the facility. A Fort Wayne city park, used primarily for recreation, is located within a quarter of a mile north of the facility. St. Mary's River is located an eighth of a mile to the east of the facility. Within a mile to the southwest is a wetlands area along Graham McCulloch Junk Ditch.

The PA/VSI identified the following eleven SWMUs and three AOCs at the facility:

Solid Waste Management Units

1. Hazardous Waste Satellite Accumulation Areas
2. Non-hazardous Waste Satellite Accumulation Areas
3. Non-hazardous Waste Storage Tanks
4. Former Wastewater Treatment Plant
5. Former Hazardous Waste Storage Area
6. Former Used Oil Underground Storage Tanks
7. Non-hazardous Waste Storage Area
8. Hazardous Waste Storage Area #1
9. Non-hazardous Flyash Waste Storage Area
10. Former Used Oil Underground Storage Tank
11. Hazardous Waste Storage Area #2

Areas of Concern

1. Former Underground Product Storage Tanks
2. Enamel House
3. Diesel Fuel Release Area

At the GE facility, there was a release of petroleum oil commercial product to the ground and possibly the ground water from an underground commercial product storage tank (AOC 1). The petroleum nature of the waste and the underground location of the release keeps the potential release to air minimal. In 1988 thirteen Underground Storage Tanks (USTs) were removed. Ten of these USTs managed petroleum oil and fuel commercial product and three held waste oils. When these USTs were removed, contamination of the soil was found around one of the tanks removed via photoionization detection (PID) of the ambient air and visual inspection. GE claims that only one UST was leaking. GE has not remediated the contaminated soil. Also, since the PID only tests the ambient air for volatiles, more substantial testing of the soil needs to be performed at all former UST locations for petroleum and xylene solvent constituents in order to characterize the contamination more clearly. GE also closed a Former Hazardous Waste Storage Area (SWMU 5). Approval of the closure came from EPA in January 1991. The closure included the sampling of soil a foot below the area; and the cleaning of the pad, its drain, and the surge tank connected to the drain. No surface soil sampling was done for the closure of this unit. The surge tank and drain were not removed with the other USTs. Subsurface and surface soil sampling are recommended to verify that the drain or surge tank has not released hazardous constituents to the soil in the past.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC) received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 member, provided the necessary assistance to complete the PA/VSI activities for the General Electric Company Taylor Street Facility (GE).

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a non-routine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the General Electric Company Taylor Street Facility in Fort Wayne, Indiana.

The PA was completed on November 13, 1991. RAI gathered and reviewed information from the Indiana Department of Environmental Management (IDEM), and from EPA Region 5 RCRA files. RAI also reviewed publications that are relevant to the area of the facility from the United States Department of Agriculture (USGS), United States Geological Survey (USGS) maps, Federal Emergency Management Agency (FEMA), the Indiana Department of Natural Resources (IDNR), and the Indiana Geological Survey (IGS).

The VSI was conducted on November 14, 1991. It included interviews with GE facility representatives and a walk-through inspection of the facility. Eleven SWMUs and three AOCs were identified at the facility.

The VSI is summarized and 20 inspection photographs are included in Attachment A. Field notes from the VSI are included in Attachment B. Underground storage tank (UST) removal photoionization (PID) readings are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors.

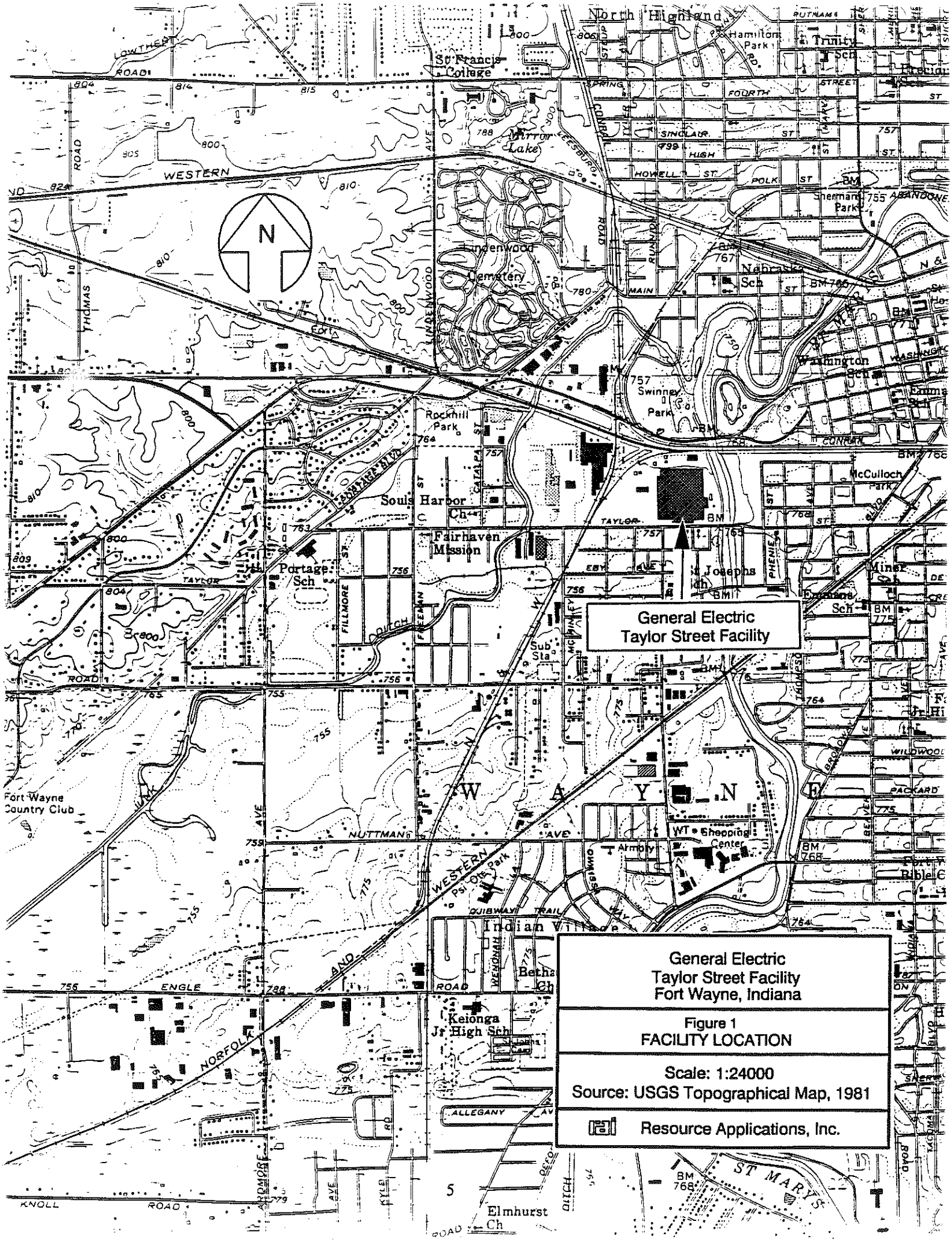
2.1 FACILITY LOCATION

GE is located at 2000 Taylor Street in central Fort Wayne, Indiana in a 1/4 mile square industrial zone (Figure 1). The facility's location is at latitude 41° 04' 23" north and longitude 85° 10' 00" west [GE, 1980b]. The facility is bordered by the St. Mary's River and the Essex Group, Chemical Processing Plant on the east; residential property on the south, the New York and St. Louis Railroad and the Slater Steel Corporation Plant on the west; and the Pennsylvania Railroad and Swinney Park (a Fort Wayne city park) on the north.

The facility (Figure 2) covers 57 acres, with the buildings occupying about 27 acres. The plant consists of three separate manufacturing operations: (1) the Motor Manufacturing Department, (2) the Wire Mill, and (3) the Aircraft Control Systems Department. Several smaller buildings at the facility include a coal-fired power house and two storage buildings.

2.2 FACILITY OPERATIONS

The United States Department of Defense (DOD) built the facility in 1942. Prior to 1942 the property was wetlands. This low land served as a landfill for the city of Fort Wayne, neighboring communities, and the general public [GE, 1991b]. Facility representatives were unable to define the types of waste disposed during this landfilling activity. The DOD contracted GE in 1942 to operate a military aircraft motor manufacturing operation at this plant. GE became the owner of the Taylor Street plant in 1945. Since 1945 the Motor Manufacturing Department has shifted to the manufacture of non-military, fractional and integral horsepower motors. Motor components (shells, endshields, and shafts) are die-cast from aluminum or steel and are machined or painted. Motor cores are also manufactured. Motor components and cores are then assembled and tested. All RCRA waste codes are listed verbatim as provided by GE's current EPA files. GE generates waste caustic stripping solution (D002); paint, solvent, and thinner wastes (F003); paint sludge (F001); waste naphtha (D001); spent clear bonding varnish; and grinding sludge from the Motor Manufacturing Department operation. The


General Electric
Taylor Street Facility
General Electric
Taylor Street Facility
Fort Wayne, Indiana
Figure 1
FACILITY LOCATION
Scale: 1:24000
Source: USGS Topographical Map, 1981
Resource Applications, Inc.
North Highland
St Francis College
Mirror Lake
Lindenwood Cemetery
Rockhill Park
Souls Harbor Ch
Fairhaven Mission
Portage Sch
Fort Wayne Country Club
Swinney Park
Washington Sch
Nebraska Sch
Sherman Park
McCulloch Park
St Josephs Ch
Miner Sch
Sub Sta
WT Shopping Center
Armory
Indian Village
Keionga Jr High Sch
Elmhurst Ch
ST MARYS
WESTERN
NUTTMAN AVE
ENGLE ROAD
NORFOLK AND
KNOLL ROAD
TAYLOR
MAIN
CONRAIL
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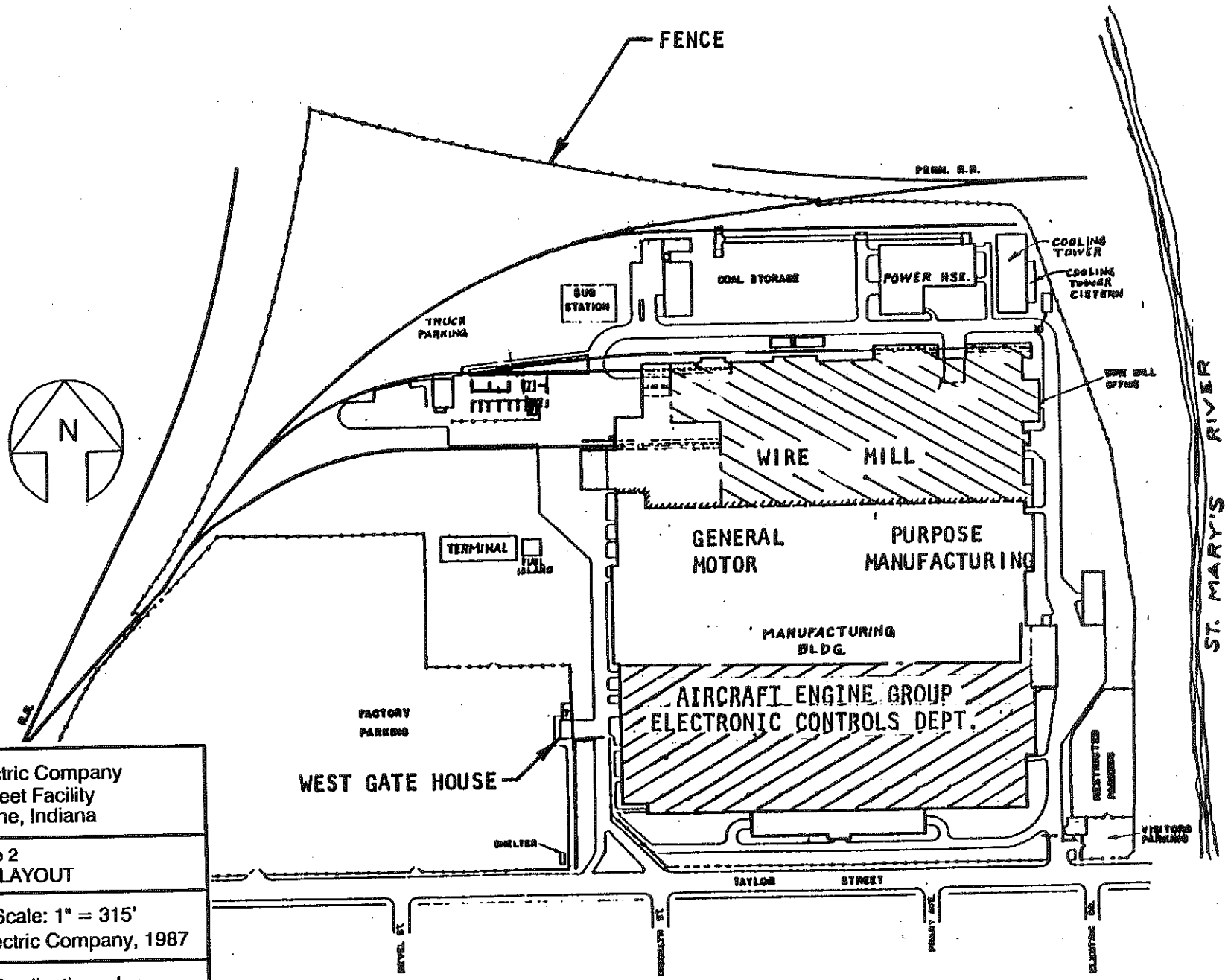


General Electric Company
Taylor Street Facility
Fort Wayne, Indiana

Figure 2
FACILITY LAYOUT

Approximate Scale: 1" = 315'
Source: General Electric Company, 1987

Resource Applications, Inc.

Motor Manufacturing Department employs approximately 420 employees. This Department operates continuously, seven days a week, 24 hours per day.

The Wire Mill operation started up in 1951. Both copper and aluminum wire is drawn to various diameters and passed through an oil/water coolant. Drawn wire is then enameled by passing it through an enamel coating and baking operation. Enameled wire is then rolled for use in wire magnet motors. The Wire Mill also contains methylene chloride (F002) and sodium hydroxide (D002) stripping operations that are run on a batch basis. GE generates waste caustic flushing solution (D002); waste methylene chloride (F002); liquid enamel waste (F002, F003, F004); solid enamel waste (F003); spent aluminum and copper drawing compound; aluminum sludge and filters; and, copper sludge and filters from the Wire Mill operation. The Wire Mill operates two shifts of workers five days a week totalling approximately 240 employees.

In 1984 the Motor Manufacturing Department area of the plant was reduced in half. At this time the Aircraft Control Systems Department (ACSD) was initiated. ACSD assembles military aircraft motor control components. ACSD operations include: printed circuit board assembly, soldering, cleaning, and coating; and equipment assembly, calibration, and testing. GE generates fluorocarbon solvent-contaminated wipes (D001, F002); spent fluorocarbon solvent (F002); spent 1,1,1-trichloroethane (TCA) (F001, F002); obsolete laboratory and miscellaneous materials (D002, D005, F002, F003, F005); and spent Genesolv (F002), an ultrapure halogenated hydrocarbon solvent of the methane and ethane series from ACSD. ACSD employs three shifts of workers totalling approximately 1,000 employees five days a week.

GE is currently classified as a large quantity generator. Prior to January 14, 1991 GE was also classified as a treatment/storage/disposal facility. However, on January 14, 1991 GE completed closure of its Hazardous Waste Container Storage Area (SWMU 5). Currently all hazardous waste is stored for less than 90 days. All non-hazardous wastes are stored on-site until there are sufficient quantities to make transport and disposal economical. The rate of generation for each waste stream depends on the rate of production each month which varies during the year. The GE facility receives its water supply from the city of Fort Wayne. The city of Fort Wayne withdraws water from the St. Mary's River, treats it, and then supplies potable water to the Fort Wayne area.

Facility SWMUs are listed in Table 1 and shown in Figures 3, 4, 5, and 6.

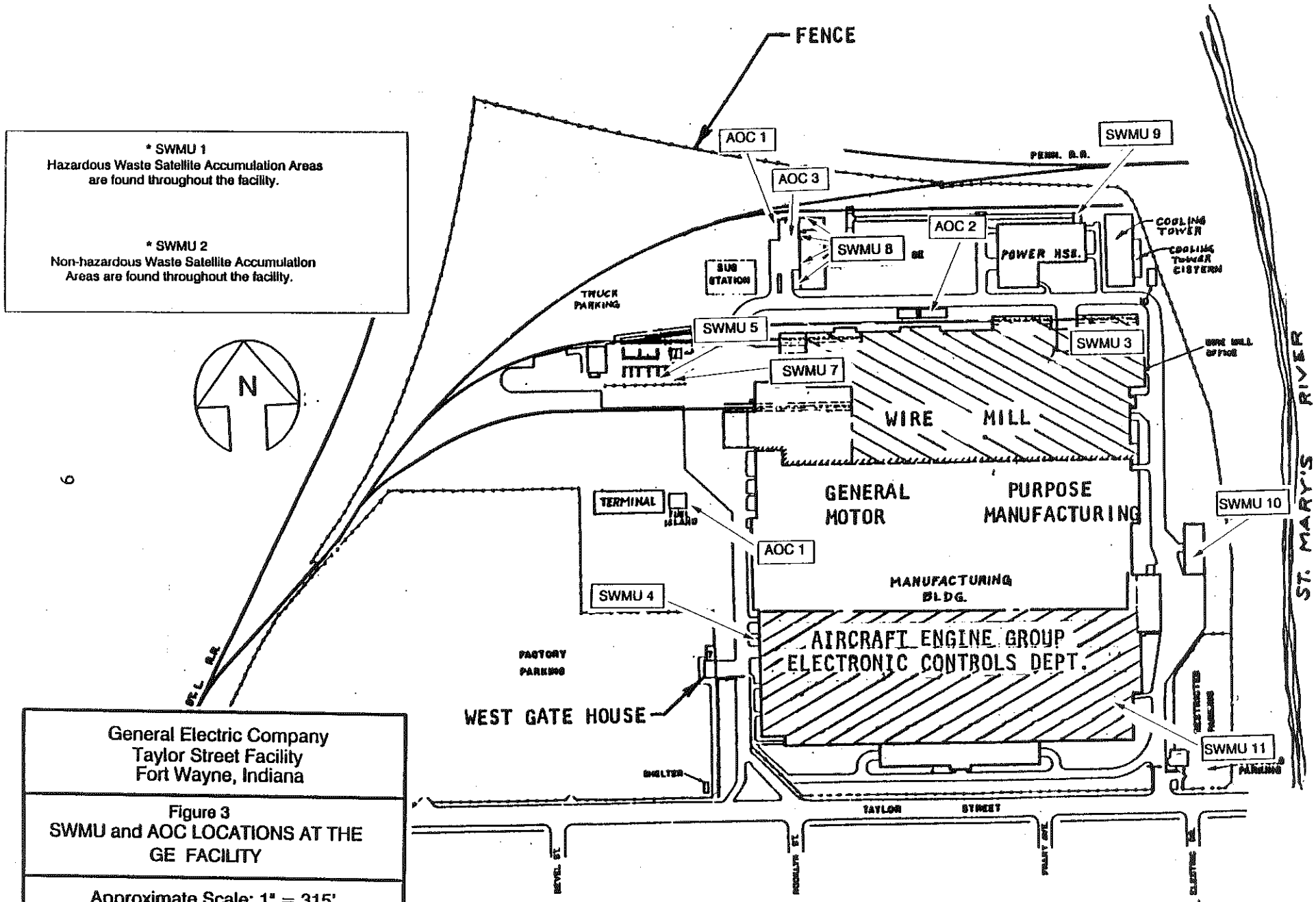
TABLE 1

SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Hazardous Waste Satellite Accumulation Areas	No	Active
2	Non-hazardous Waste Satellite Accumulation Areas	No	Active
3	Non-hazardous Waste Storage Tanks	No	Active
4	Former Wastewater Treatment Plant	No	Inactive, removed in 1985
5	Former Hazardous Waste Storage Area	Yes	Inactive, closed in 1991
6	Former Used Oil Underground Storage Tanks	No	Inactive, removed in 1988
7	Non-hazardous Waste Storage Area	No	Active
8	Hazardous Waste Storage Area #1	No	Active, Less than 90-day storage, Start-up in 1988
9	Non-hazardous Flyash Waste Storage Area	No	Active
10	Former Used Oil Underground Storage Tank	No	Inactive, removed in 1988
11	Hazardous Waste Storage Area #2	No	Active, Less than 90-day storage, Start-up in 1985

Note:

* A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



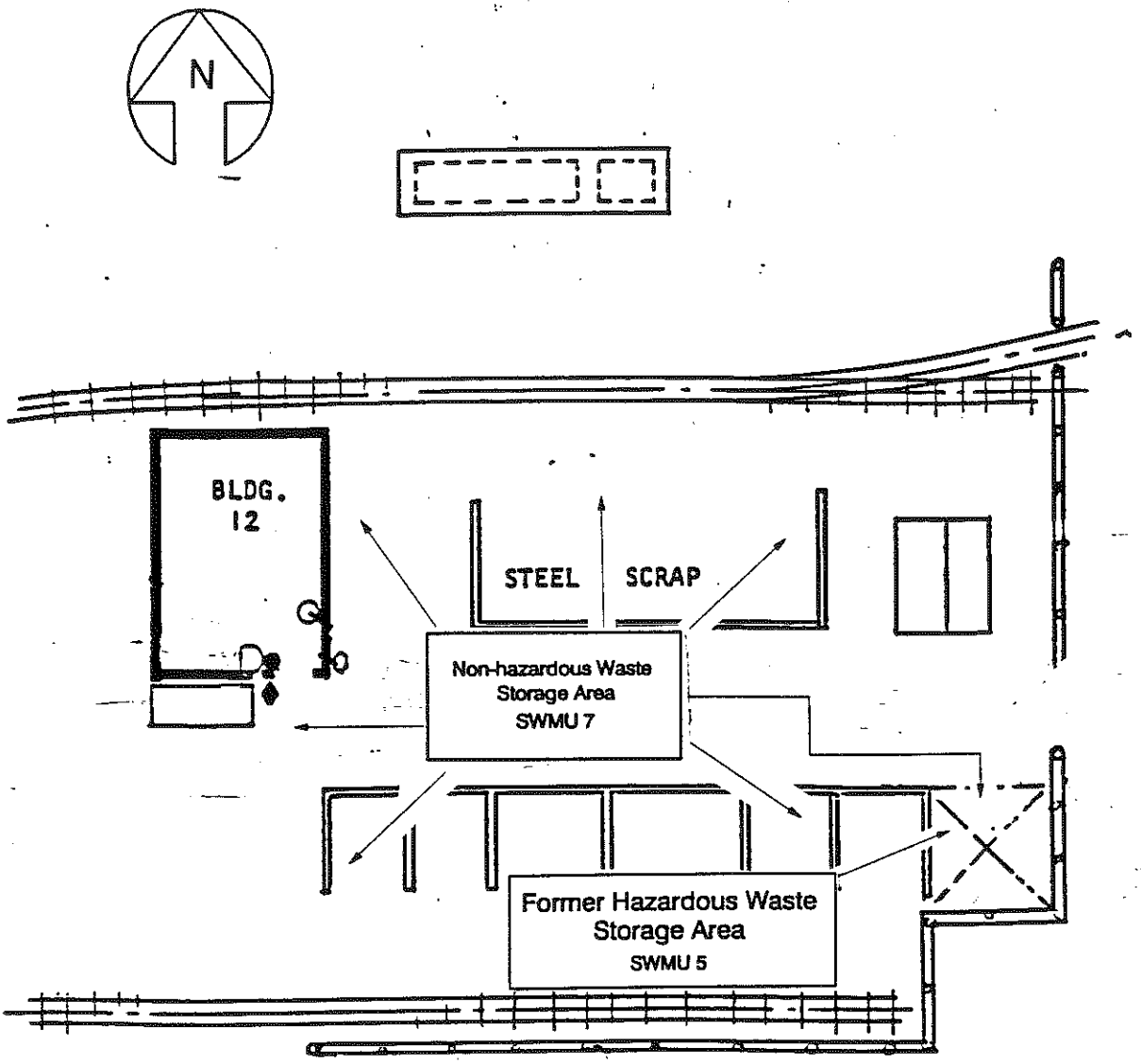
General Electric Company
Taylor Street Facility
Fort Wayne, Indiana

Figure 3
SWMU and AOC LOCATIONS AT THE GE FACILITY

Approximate Scale: 1" = 315'
Source: General Electric Company, 1987

Resource Applications, Inc.

SALVAGE YARD & WASTE STORAGE AREA PLOT PLAN



General Electric Company
Taylor Street Facility
Fort Wayne, Indiana

Figure 4
WASTE STORAGE AREA
(SWMU 5, 6 AND 7)

Approximate Scale: 1" = 66'
Source: General Electric Company, 1985

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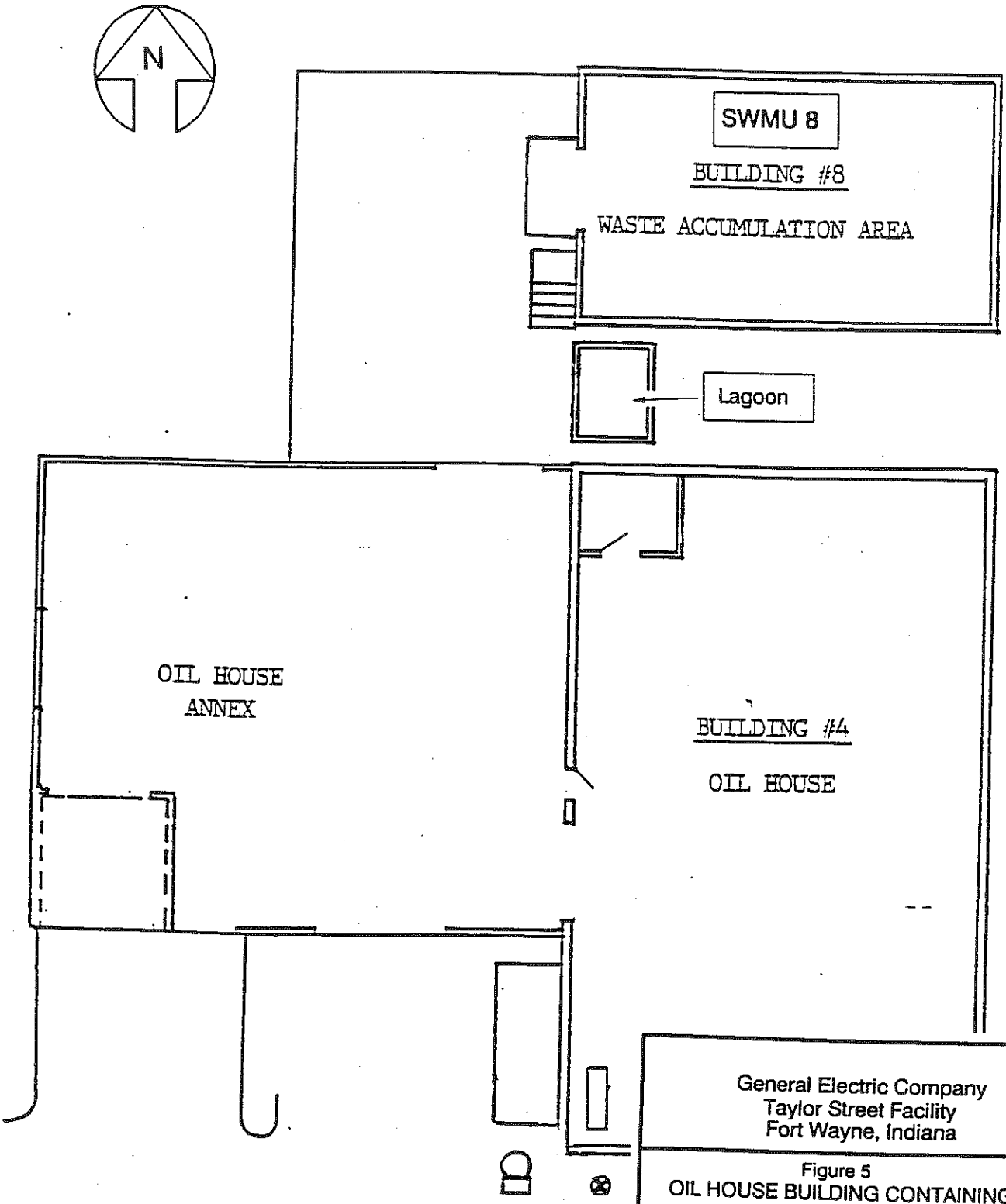

General Electric Company
Taylor Street Facility
Fort Wayne, Indiana

Figure 5
OIL HOUSE BUILDING CONTAINING
HAZARDOUS WASTE STORAGE AREA #1
(SWMU 8)

Approximate Scale: 1" = 20'
Source: General Electric Company, 1991b

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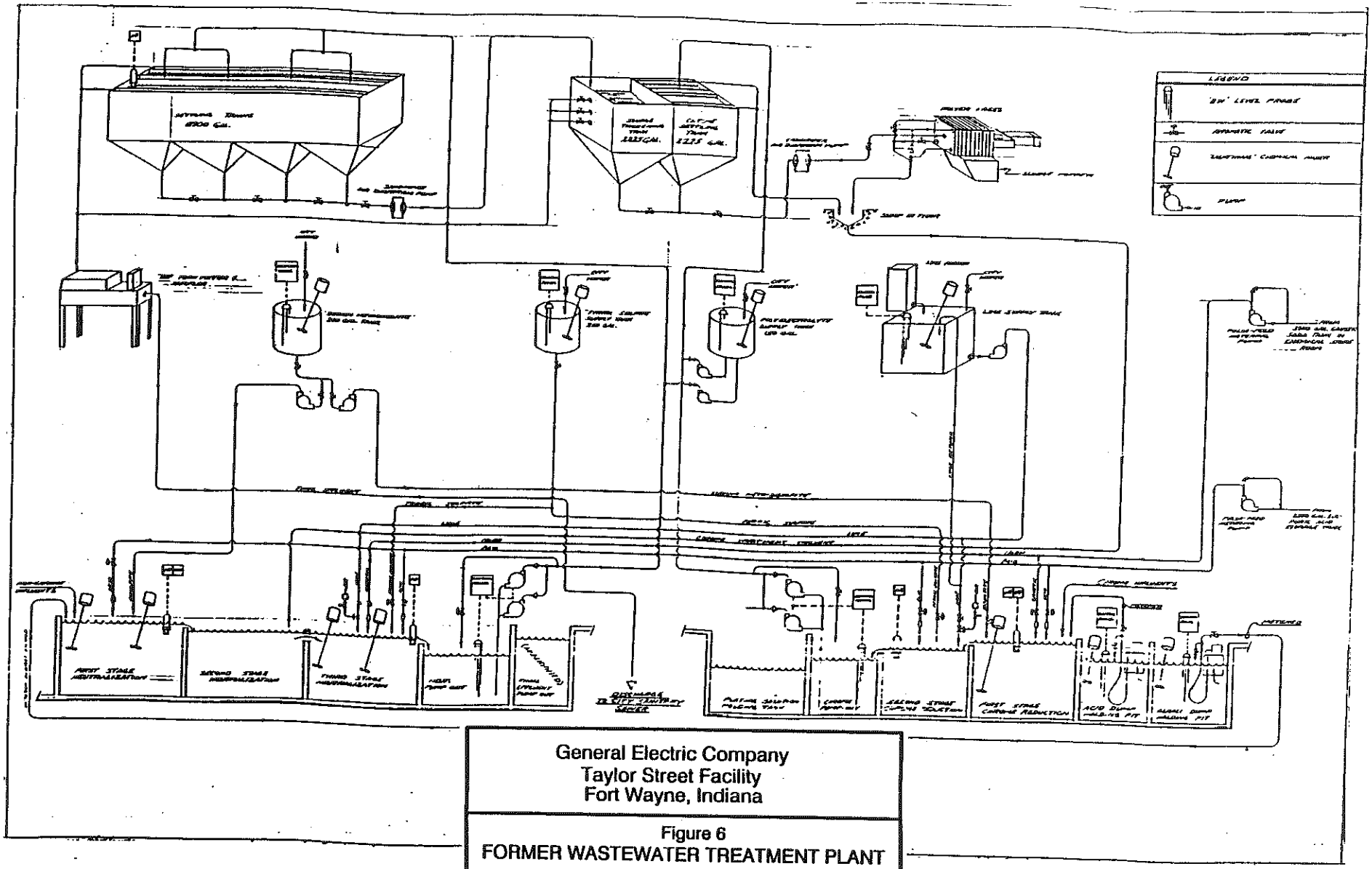

General Electric Company
Taylor Street Facility
Fort Wayne, Indiana

Figure 6
FORMER WASTEWATER TREATMENT PLANT
FLOW DIAGRAM OF SWMU 4

Source: General Electric Company, 1991b

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2.3 WASTE GENERATING PROCESSES

The GE facility routinely generates a number of hazardous and non-hazardous wastes from its operation. The facility's hazardous and non-hazardous waste streams are detailed in Table 2. All RCRA waste codes are listed verbatim as provided by GE's current EPA files.

The facility no longer generates D006 chrome reduction sludge or D002 plating bath sludge from zinc and chrome plating. The zinc and chrome plating processes were discontinued in 1985. Zinc and chrome plating wastewater and sludge were treated together in one process. Figure 6 shows a diagram of this former plating process and its wastewater treatment plant (SWMU 4). The unit was approximately 16 1/2-feet wide and 38-feet long. It consisted of 19 sub-units. After the plating process was completed, the zinc and chrome plating solution was pumped to a 2,225-gallon, steel, settling tank. The chrome reduction sludge was allowed to settle out. Pipes at various heights drained off the wastewater into a sump in the floor. The chrome reduction sludge was pumped to a filter press unit. The chrome reduction sludge was pressed and then dumped into a sludge hopper of an unknown size. The wastewater squeezed from the filter press operation was drained into a sump in the floor. From this sump the wastewater was then piped into a wastewater neutralization treatment process. Sulfuric acid, sodium metabisulfate, lime, caustic soda, and ferric sulfate were added as neutralization agents. The effluent was then pumped to a 8,900-gallon steel settling tank. Once again chrome reduction sludge (D006) was allowed to settle. The wastewater was drained from the unit via various pipes and valves at various heights on the settling tank. The wastewater was then allowed to drain directly into the Fort Wayne Sanitary Sewer System. The chrome reduction sludge was pumped out of the settling tank and placed into a sludge thickening tank. Once again the wastewater was drained off the top and piped directly into the Fort Wayne Sanitary Sewer System. After the sludge thickened, the sludge was piped to the same filter press used previously. The wastewater pressed out of the sludge reentered the neutralization process. The sludge was deposited into a sludge hopper of unknown size. Both types of wastewater treatment sludge were disposed at the Adams Center Landfill in Fort Wayne, Indiana. Plating bath sludge (D002) was also generated from this process, but GE representatives had no information concerning this waste.

Three waste caustic (sodium hydroxide) solutions (D002) are generated at the facility. First, waste caustic stripping solution is generated from the cleaning of the wire drawing compound system. The system is cleaned twice per year with a caustic solution; the resulting waste is then placed into a 55-gallon steel drum in a primary Hazardous Waste Satellite Accumulation Area (SWMU 1). When the drum becomes full it is taken to the Hazardous Waste Storage Area #1 (SWMU 8). Second, waste

TABLE 2

SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit
Chrome Reduction Sludge/ D006	Chrome and Zinc Plating Wastewater Treatment Plant	SWMU 4, 8
Plating Bath Sludge/D002	Chrome and Zinc Plating Wastewater Treatment Plant	SWMU 4, 8
Waste Sodium Hydroxide Stripping Solution/D002	Wire Drawing Compound System Cleaning and Die-cast Mold Cleaning	SWMU 1, 8
Waste Methylene Chloride/ F002	Sheave Cleaning	SWMU 1, 8
Waste Enamels (Liquid)/ F002, F003, F004	Magnet Wire Insulating Operation	SWMU 1, 8
Waste Enamels (Solid)/ F003	Magnet Wire Insulating Operation	SWMU 1, 8
Spent Methyl Pyrrolidine/D001	Wire Mill Enameling Thinning Agent	SWMU 1, 8
Fluorocarbon Solvent (Liquid)/F002	Printed Circuit Board Cleaning	SWMU 1, 8
Fluorocarbon Solvent Contaminated Wipes (Solid)/ F002	Printed Circuit Board Cleaning	SWMU 1, 8
Spent Trichlorotrifluorethane (Genesolv)/F002	Metallic Circuit Board Cleaning	SWMU 1, 8
Spent Paint/F003	Electric Motor Painting	SWMU 1, 8
Spent Thinners/F003	Electric Motor Painting	SWMU 1, 8
Spent Xylene/F003	Electric Motor Painting	SWMU 1, 8
Paint Sludge/F001	Electric Motor Painting	SWMU 1, 8
Waste 1,1,1-Trichloroethane (TCA) /F001, F002	Printed Circuit Board Cleaning	SWMU 1, 8 or 11
Waste Naphtha/D001	Product and Parts Cleaning	SWMU 1, 8

TABLE 2 (continued)

SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit
Obsolete Laboratory Materials/ D002, D005, F002, F003, F005	Materials Exceeding Shelf Life	SWMU 1, 8
Spent Organic Varnish/D001	Varnish Dip Tank Operations	SWMU 1, 8
Spent Water Soluble Varnish	Varnish Dip Tank Operations	SWMU 2, 7
PCB-contaminated Solvents/ F003	Dielectric Removal	SWMU 1, 8
PCB-contaminated Oil	Dielectric Removal	SWMU 1, 8
Barium Salt Waste/D005	Transformer Removal	SWMU 1, 8
Solder Dross/D008	Scrap From Circuit Board Manufacturing	SWMU 1, 8
Cooling Tower Sludge/D006	Cooling Tower Units	SWMU 1, 8
Spent Aluminum and Copper Drawing Compound	Wire Drawing Compound System	SWMU 3, 7
Aluminum Sludge	Aluminum Drawing Compound System	SWMU 2, 7
Aluminum Filters	Aluminum Drawing Compound System	SWMU 2, 7
Copper Sludge	Copper Drawing Compound	SWMU 2, 7
Copper Filters	Copper Drawing Compound System	SWMU 2, 7
Grinding Sludge/Swarf	Metal Grinding Operations	SWMU 2, 7
Used Oils	Motor Manufacturing and Wire Mill Operations	SWMU 2, 7
Used Oils/D001	Motor Manufacturing, Wire Mill, and Maintenance Operations	SWMU 10

TABLE 2 (continued)

SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit
Scrap Copper and Aluminum	Motor Manufacturing and Wire Mill Operations	SWMU 2, 7
Steel Shot	Shotblasting Cleaning	SWMU 2, 7
Flyash	Power House Operations	SWMU 9
Spent Propylene Glycol Antifreeze	Sprinkler Cleaning	SWMU 1, 8
Old Forklift Batteries	Forklift Maintenance	SWMU 2, 7

Note:

* Prior to January 1, 1986, all types of hazardous waste generated at the facility would also have been managed at SWMU 5 and/or SWMU 6.

caustic solution is generated from stripping dies used in the wire drawing process at the Wire Mill; a small amount of this waste is generated daily and placed in a 55-gallon steel drum in a primary Hazardous Waste Satellite Accumulation Area (SWMU 1). When this drum becomes full it is moved to the Hazardous Waste Storage Area #1 (SWMU 8). Third, waste caustic solution is generated in the Motor Manufacturing Department. Die-cast molds used to cast aluminum motor parts are cleaned by immersion in a tank containing caustic soda. Caustic soda waste is generated twice per year when the system is drained. The waste is then transferred to a 55-gallon steel drum and placed in a primary Hazardous Waste Satellite Accumulation Area (SWMU 1). When the drum becomes full, it is moved to the Hazardous Waste Storage Area #1 (SWMU 8). All caustic waste solutions (D002) are removed within 90 days of storage from the Hazardous Waste Storage Area #1. An estimated 1,000 gallons of caustic wastewater were generated in 1990 [GE, 1991b]. This waste is sent to Trade Waste Incineration in Sauget, Illinois for treatment [GE, 1991b].

Waste methylene chloride (F002) is generated from cleaning sheaves (small pulleys) used in the wire enameling process. As wire runs through the enameling ovens, waste enamel (F002, F003, F004) accumulates on the sheaves. The sheaves are cleaned in a stripping tank using a methylene chloride solution in a primary Hazardous Waste Satellite Accumulation Area (SWMU 1). Waste from this process is pumped into a 55-gallon steel drum. When the drum becomes full, it is moved to the Hazardous Waste Storage Area #1 (SWMU 8). An estimated 110 gallons of waste methylene chloride were generated in 1990 [GE, 1991b]. This waste is sent to Trade Waste Incineration in Sauget, Illinois for treatment [GE, 1991b].

Liquid and solid waste enamels (F002, F003, F004) are generated in the Wire Mill and are associated with insulation of motor magnet wire. Copper and aluminum wire is coated with various enamels and cured in ovens. The liquid waste is generated from system flushings during changeover, sampling of enamels, and flushing of tanker truck lines after incoming product shipments. The solid waste consists of enamel-saturated cartridge filters, contaminated rags, and cleanup debris. The liquid and solid waste are segregated and placed in 55-gallon steel drums in one of two primary Hazardous Waste Satellite Accumulation Areas (SWMU 1). When these drums become full, the drums are moved to the Hazardous Waste Storage Area #1 (SWMU 8). An estimated 11,000 gallons of solid and liquid enamel wastes were generated in 1990 [GE, 1991b]. These wastes are removed by Safety-Kleen and then used for fuel blending [GE, 1991b]. Often spent methyl pyrrolidine (D001) is used as a wire enameling thinning agent. It is disposed of with the liquid enamel wastes.

Fluorocarbon solvent (F002) and Genesolv (tradename for trichlorotrifluoroethane) (F002) wastes are generated in the Aircraft Control Systems Department from circuit board cleaning. Solid waste consists of fluorocarbon-saturated rags from hand-cleaning of circuit boards and liquid waste is generated from solvent spray booths used to clean solder flux and other contaminants from circuit boards. The solid waste is stored in one-gallon galvanized steel pails in various primary Hazardous Waste Satellite Accumulations Areas (SWMU 1) before being transferred to a 55-gallon steel drum in a secondary Hazardous Waste Satellite Accumulation Areas (SWMU 1). When the drum becomes full, it is moved to the Hazardous Waste Storage Area #1 (SWMU 8). The liquid waste is collected from the spray booths and placed into a 55-gallon steel drum in one of the primary Hazardous Waste Satellite Accumulation Areas (SWMU 1). When the drum is full, it is moved to the Hazardous Waste Storage Area #1 (SWMU 8) also. An estimated 110 gallons of spent Genesolv (D002) and 50,000 pounds of spent fluorocarbon were generated in 1990 [GE, 1991b]. These wastes are removed by Petro Chem Processing in Detroit, Michigan for solvent recovery [GE, 1991b].

Spent paint, xylene, and thinner (F003) wastes are generated in the Motor Manufacturing Department. The waste from the painting of electric motors consists of off-specification paints, thinner, and solvent from cleaning of spray guns and parts, and paints drained from hand dip operations during maintenance. These wastes are stored in 55-gallon steel drums in several primary Hazardous Waste Satellite Accumulation Areas (SWMU 1). When the drums become full, the drums are moved to the Hazardous Waste Storage Area #1 (SWMU 8). An estimated 3,600 gallons of these wastes were generated in 1990 [GE, 1991b]. These wastes are removed by Safety-Kleen for solvent recovery [GE, 1991b].

Spent 1,1,1-trichloroethane (TCA) (F001, F002) is generated in the Aircraft Control Systems Department. This waste is generated from various degreasing processes located throughout the department. The spent TCA liquids are generated when these degreasers are cleaned out; and are pumped into various size containers up to 55 gallons in primary Hazardous Waste Satellite Accumulation Areas (SWMU 1). When these containers become full, the containers are transferred to the Hazardous Waste Storage Area #1 (SWMU 8). The solid TCA waste consists of TCA-contaminated wipes. These wipes are placed in plastic-lined, wastebaskets in a primary Hazardous Waste Satellite Accumulation Area (SWMU 1). Once each day, these wastebaskets are emptied into several 55-gallon steel drums in a secondary Hazardous Waste Satellite Accumulation Area (SWMU 1). These drums are directly taken to a 9-cubic yard dumpster in the Hazardous Waste Storage Area #2 (SWMU 11). An estimated 7,000 gallons of liquid and 64,313 pounds per year of solid TCA waste were generated in 1990 [GE, 1991b]. Both waste streams are removed by Safety-Kleen for solvent recovery or fuel blending.

Paint sludge (F001) is generated in the water wash spray in the Motor Manufacturing Department. Motors are electostatically sprayed in a spray booth equipped with a water wash curtain. Particulates from the water wash are accumulated in a sump (SWMU 1) and then transferred to a secondary Hazardous Waste Satellite Accumulation Area (SWMU 1) and placed in a 55-gallon steel drum. When this drum becomes full, it is moved to the Hazardous Waste Storage Area #1 (SWMU 8). An estimated 1,700 gallons of paint sludge were generated in 1990 [GE, 1991b]. This paint sludge was transported to Trade Waste Incineration in Sauget, Illinois for incineration.

The facility operates several parts cleaners in the die cast repair area of the Motor Manufacturing Department. Spent naphtha (D001) is drained from the parts cleaners and pumped into 55-gallon steel drums. These drums are placed in primary Hazardous Waste Satellite Accumulation Areas (SWMU 1). When the drum becomes full, it is moved to the Hazardous Waste Storage Area #1 (SWMU 8). An estimated 500 gallons of spent naphtha were generated in 1990 [GE, 1991b]. This spent naphtha was transported by Safety-Kleen to its plant in Elgin, Illinois for solvent recovery.

The facility also generates other hazardous material wastes. These wastes include obsolete commercial products or materials that have exceeded their shelf life. These obsolete or out-dated items are referred to as Lab Packs (D002, D005, F002, F003, F005). Lab Packs may contain circuit mounting boards in an enclosure, or circuit board potting. Before these Lab Packs are disposed, the Maintenance Department is allowed to take items that it can use. After this, the Lab Pack waste is placed in plastic bins (two-feet by 2-feet by 2-inch) in a primary Hazardous Waste Satellite Accumulation Area (SWMU 1). When these bins become full, the Lab Packs and bins are packaged in cardboard, plastic wrapped and set within the Hazardous Waste Storage Area #1 (SWMU 8). An estimated 38,000 pounds of Lab Pack wastes were generated in 1990 [GE, 1991b]. The Lab Pack waste were incinerated at Trade Waste Incineration in Sauget, Illinois and/or Chemical Waste Management, chemical Services, in Chicago, Illinois.

The GE facility also generates two types of varnish waste. One is water soluble, the other is organic with xylene thinner (D001). A motor consists of two parts, the stator and the rotor. The stator is dipped in varnish to protect the metal from corrosion. The varnish tanks are cleaned out when the varnish no longer meets specifications for use in motor assembly. Both of the spent varnishes are generated when this cleaning is done. The non-hazardous spent varnish is pumped into steel 55-gallon drums and set within one of two Non-hazardous Waste Satellite Accumulation Areas (SWMU 2). When the drums become full, they are moved to the Non-hazardous Waste Storage Area #1 (SWMU

8). This waste stream is managed at O.H. Materials Corporation. An estimated 2,500 gallons of this waste were generated in 1990 [GE, 1991b]. The hazardous waste varnish (D001) is also pumped into 55-gallon steel drums. These drums are moved to a primary Hazardous Waste Satellite Accumulation Area (SWMU 1). When the drum becomes full, it is moved to the Hazardous Waste Storage Area #1 (SWMU 8). An estimated 200 gallons of this waste stream were generated in 1990 [GE, 1991b]. This waste varnish is transported to Petro-Chem Processing of Detroit, Michigan for fuel blending.

GE recently finished a four year program to remove all suspected chlorinated pollutants from its transformers and generators. PCB-contaminated oils and solvents (special, D001, F003) and waste barium salt (D005) were placed into 55-gallon steel drums, and placed in the Hazardous Waste Storage Area #1 (SWMU 8) until transport was made to another GE plant in Ohio for treatment/incineration.

Solder dross is generated from the Aircraft Control Systems Department. Up until October 1991, solder dross was sold to a metals reclaimer by auction to the highest bidder. Within the last month, the solder dross has been determined to be hazardous. GE has characterized this waste as D008 for lead constituents. GE has not yet decided where the solder dross (D008) will be disposed. Currently, the waste is collected in one-gallon pails (SWMU 1); placed in a 55-gallon steel drum when these pails become full (SWMU 1); and then moved to the Hazardous Waste Storage Area #1 (SWMU 8).

Cooling Tower Sludge (D006) is generated during cleaning of the cooling tower basins used to cool process and boiler waters. This cleaning process occurs once every five to ten years. When the cooling towers were last cleaned, the waste was pumped into 55-gallon steel drums and stored in the Former Hazardous Waste Storage Area (SWMU 5). In the future, this waste will be stored in the new Hazardous Waste Storage Area #1 (SWMU 8). Facility representatives were unable to provide waste disposal information for this waste.

Most of the GE's non-hazardous wastes are generated in the Wire Mill and are associated with the wire drawing system. Both the copper and aluminum drawing systems are continuous operations that use large volumes of water-soluble oil (drawing compound) as a coolant. The coolant is circulated through surge tanks in the Wire Mill basement; metallic fines are settled or removed by centrifuge or filtering. The waste coolant (drawing compound) is pumped to two 7,000-gallon fiberglass Non-hazardous Waste Storage Tanks (SWMU 3). When these tanks become full, the waste coolant is removed by tanker truck by Heritage Environmental Services of Indianapolis, Indiana for treatment, oil recovery, or incineration. Some of this coolant (drawing compound) and metallic fines and filters are

placed in 55-gallon steel drums in the Non-hazardous Waste Storage Area (SWMU 7). A estimated 13,000 gallons of waste coolant (drawing compounds) and 7,330 gallons of mixed waste coolant (drawing compounds) and metallic fines and/or filters were generated in 1990 [GE, 1991b].

The GE facility generates grinding sludge in the Motor Manufacturing Department. Grinding sludge is generated from milling of engine components and consists mainly of metal shavings. This waste is placed in several six-cubic yard steel dumpsters (SWMU 2). When these dumpsters become full, the waste is placed in a 30-cubic yard steel dumpster (SWMU 2). This grinding sludge is then disposed at Danville Landfill. Approximately 12,000 gallons of this waste were generated in 1990 [GE, 1991b].

Used oils (D001) are generated in the Wire Mill, the Maintenance Department and Motor Manufacturing Department. Previous to 1988, used oils were stored in three underground hazardous waste storage tanks (USTs). Two of these Former Used Oil USTs (SWMU 6) were located next to the Former Hazardous Waste Storage Area (SWMU 5) and the other Former Used Oil UST (SWMU 10) was located by itself on the east side of the GE property. When these tanks became full, the waste was pumped to tanker trucks. The oil was then sent to either a reclaimer or a fuel blender. Since 1988, all waste oil is pumped into 55-gallon steel drums in primary Hazardous Waste Satellite Accumulation Areas (SWMU 1). When the drums become full, the drums are transferred to the Hazardous Waste Storage Area #1 (SWMU 8).

Scrap copper and aluminum are generated in large quantities from both the Wire Mill and the Motor Manufacturing Department. This waste is placed in at least two dozen 6-cubic yard steel dumpsters in various spots (SWMU 2) throughout the two departments. This steel scrap is then taken to the Non-hazardous Waste Storage Area (SWMU 7) for storage. When enough scrap accumulates, it is sold to the highest bidder for reclamation.

Steel shot waste is generated during the shotblast cleaning of motor endshields. This waste is collected via a baghouse dust collector and a steel 55-gallon drum (SWMU 2). Once the drum becomes full, it is moved to the Non-hazardous Waste Storage Area (SWMU 7). Approximately 330 gallons of steel shot were generated in 1990 [GE, 1991b]. Steel shot waste is taken to Adams Center Landfill in Fort Wayne, Indiana for disposal.

GE's Power House generates wet and dry flyash. The dry flyash is directly deposited from a chute into a plastic-lined 5-cubic yard steel dumpster in the Non-hazardous Flyash Waste Storage Area

(SWMU 9). A second dumpster collects the wet flyash that deposits out of a second chute within SWMU 9. Both of these dumpsters are emptied into a third dumpster for storage. Wet flyash is dry flyash mixed with steam condensation. This waste is sold to various companies for fill in landfills and for asphalt road bedding.

Every two or three years GE must flush its fire sprinkler system. Spent propylene glycol antifreeze is used in the system. When this antifreeze is flushed, it is placed into steel 55-gallon drums and placed in the Non-hazardous Waste Storage Area (SWMU 7). This waste was sent to a reclaimer for treatment.

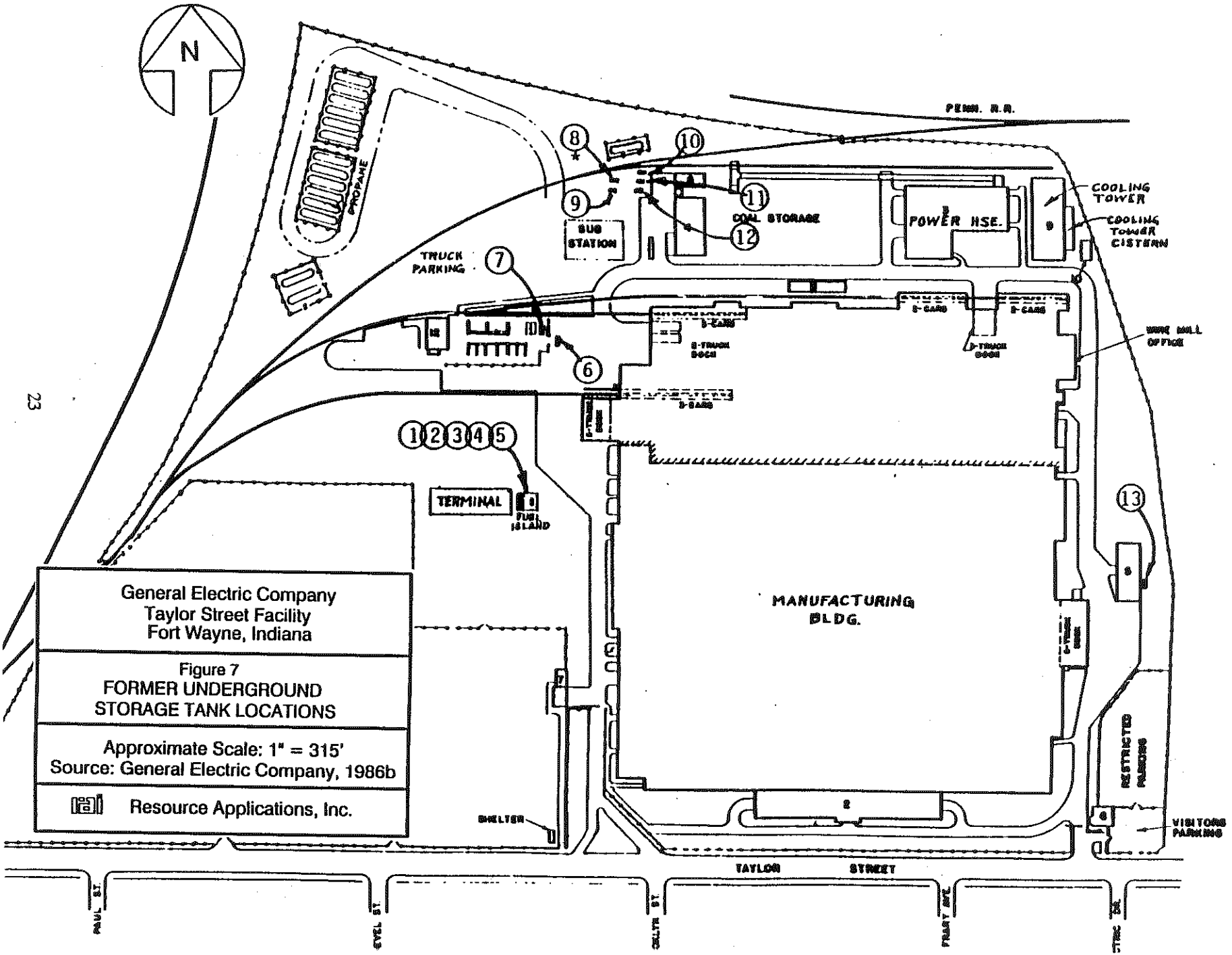
GE also generates spent forklift batteries and spent mineral spirits from its Maintenance Department. The batteries are placed in a metal trough (SWMU 2) until enough are accumulated, and then the batteries are sold to the highest bidder for reclamation.

All hazardous wastes stored in drums was stored in the Former Hazardous Waste Storage Area (SWMU 5) prior to January 1, 1986. If a release occurred from drums occupying this area, the waste drained into a 15,000 gallon steel, underground surge tank connected to the facility's stormwater drainage system. Periodically this surge tank would release the wastewater/stormwater into an oil/water separator unit. The wastewater was allowed to drain into the St. Mary's River. The waste oil was skimmed into pipes that led into two 1,000-gallon steel USTs (SWMU 6). This waste oil would be occasionally pumped out and used for fuel blending. Both the USTs and the oil/water separator were removed in 1988.

2.4 HISTORY OF DOCUMENTED RELEASES

During the summer of 1988, O.H. Materials Corporation removed 12 USTs (nine commercial product and three waste), one oil/water separator, and conducted "In Place Disposal" of one commercial product UST. Of the 13 removed/closed USTs, one exhibited signs of leakage. Leakage was determined via visual inspection and the use of a photoionization detector (PID) [O.H. Materials Corporation (OHM), 1989]. High levels of volatiles were detected around UST Nos. 8, 9, 10, and 11 (Figure 7). USTs Nos. 8 and 9 contained kerosene and xylene commercial product prior to May of 1982. UST Nos. 10 and 11 stored oil commercial product prior to May of 1982. These four USTs were grouped together on the northside of the facility. GE claims that only UST No. 11 contributed to contaminated-soil found during the UST removal. GE is currently studying the problem. Attachment C contains PID readings recorded during the UST removal.

In a report dated May 1, 1986 showing pollutants from GE's three National Pollutant Discharge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PENN. R.R.
PROPANE
SUB STATION
COAL STORAGE
POWER HSE.
COOLING TOWER
COOLING TOWER CISTERN
TRUCK PARKING
WIRE MILL OFFICE
TERMINAL
FUEL ISLAND
MANUFACTURING BLDG.
RESTRICTED PARKING
VISITORS PARKING
SHELTER
TAYLOR STREET
PAUL ST.
CALVERT ST.
CLINTON ST.
FRANKLIN ST.
CLAY ST.
General Electric Company
Taylor Street Facility
Fort Wayne, Indiana
Figure 7
FORMER UNDERGROUND
STORAGE TANK LOCATIONS
Approximate Scale: 1" = 315'
Source: General Electric Company, 1986b
Resource Applications, Inc.

per year and stored in drums (S01) [GE, 1980b]. GE amended its RCRA Part A permit application on November 17, 1980 [GE, 1980c]. GE deleted waste codes F008, F010, F013, and F017, but added D002 to the list. GE also inserted "actual" rather than "estimated" annual quantities of waste for each waste listed on Page 3. Storage of waste in tanks (T01) was deleted also from the list. EPA verified GE's hazardous waste activity on September 28, 1981 [EPA, 1981]. GE amended its RCRA Part A permit application on February 16, April 26, and July 2, 1982 GE [GE, 1982a, 1982b, 1982c]. GE changed its estimated annual quantity of wastes and changed its design capacities.

GE submitted a closure plan to IDEM for the Hazardous Waste Storage Area (SWMU 5), and after multiple modifications, completed closure of the unit on January 14, 1991 [IDEM, 1991a]. GE is currently classified as a large quantity generator.

Over the past nine years the Division of Land Pollution Control (LPC) of the Indiana State Board of Health (ISBH) and its successor, the Indiana Department of Environmental Management (IDEM) have conducted several investigations into GE's waste management practices. A Compliance Inquiry Letter (CIL) was sent to GE after each inspection. CILs were sent to GE after IDEM's RCRA Compliance and Land Disposal Restriction Inspections on April 13, 1983, January 8, 1987, June 15, 1989 and January 11, 1991 [IDEM, 1983a, 1987a, 1989, 1991d]. The CILs were issued for paperwork deficiencies and lack of correct hazardous waste labeling and accumulation start dates. As of August 23, 1991, GE has achieved compliance for all outstanding violations.

GE has two Fort Wayne Industrial Discharge Permits (Permit #IFT03806 and Permit #IFT03807) that authorize wastewater discharge from its facility to the sewer system of the City of Fort Wayne (Figure 8) [City of Fort Wayne, 1991a, 1991b]. Both permits will expire January 14, 1995. Permit #IFT03806 serves the Wire Mill operation's process and sanitary wastewater flows. This wastewater is subject to the aluminum/copper pretreatment standards of CFR 467 and CFR 468 [GE, 1991b]. By February of 1992, no Wire Mill process wastewater will be discharged to this city outfall [GE, 1991b]. Permit #IFT03087 serves the Motor Manufacturing Department's process and sanitary water flows and AECD's sanitary wastewater flow. This wastewater is subject to the pretreatment standards of CFR 433 [GE, 1991b].

Three NPDES permits were issued to the GE facility for the release of storm water and non-contact cooling waters into the St. Mary's River. These three permits expired on June 30, 1990. An application for permit renewal was made on January 30, 1990 [GE, 1991c].

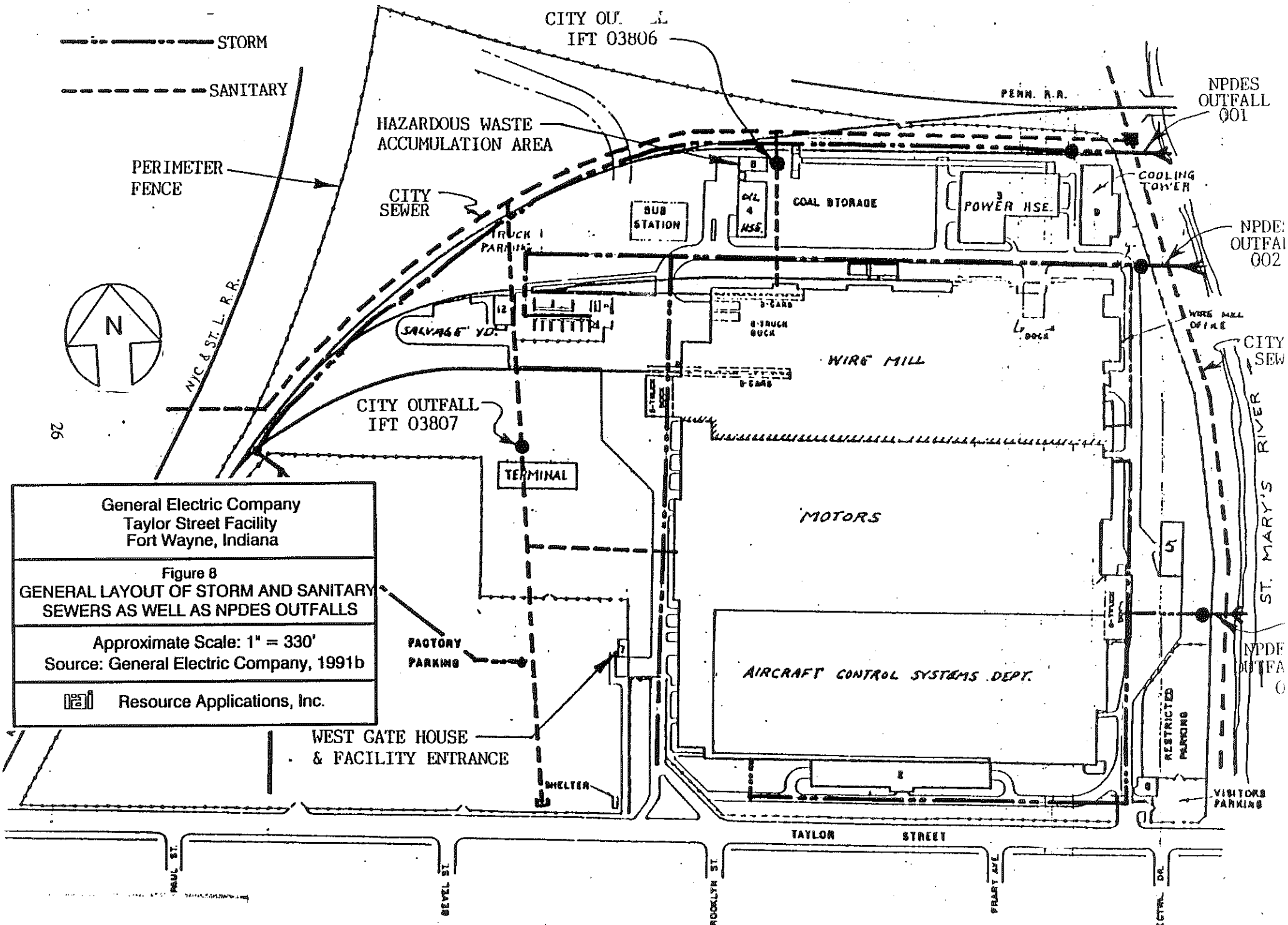
GE also had seven Indiana 325-IAC Air Operating Permits [GE, 1991b]. Three of these permits are

Elimination Survey (NPDES) permitted outfalls into the St. Mary's River, it was noted that Outfall 001 exhibited high levels of dissolved iron, total iron, aluminum, oil and grease, and total suspended solids [IDEM, 1986]. The source of these was investigated and it was believed to be caused by runoff from the coal storage area. In December of 1986 this Outfall was routed to the city of Fort Wayne Sanitary Sewer System. At Outfall 002, 1,1,1-trichloroethane was detected in the effluent. Representatives of GE believed that it was runoff from the Former Hazardous Waste Storage Area (SWMU 5). GE completed closure of this unit in January of 1991.

On May 7, 1991 GE had a water-soluble oil spill which escaped to the St. Mary's River via GE's storm sewer system and NPDES Outfall 002 [GE, 1991a]. The contaminated discharge to the St. Mary's River was created by the accidental spillage of five gallons of water soluble oil to the storm water collection system. A GE employee observed the spill during his daily inspection of the NPDES discharges into the St. Mary's River. He first observed a faint cloudiness developing in the monitoring station for NPDES Outfall No. 002. The discharge end of the pipe was sandbagged to contain flow and product. A second sandbag dike was constructed in the discharge trench leading from the end of the pipe to the river to contain any flow that may have seeped through the first dike. Later in the day, Liquid Waste Removal in Greenwood, Indiana began removing the accumulation of water and oil from the storm sewer line. The pipe line was then washed to clean and remove any residual oil. The discharge trench between the sandbag dikes was pumped out to remove all water and any product that may have seeped through. Approximately 3,500 gallons of water accumulation, jet and rinse wastewaters, and trench water were gathered and transported to Heritage Environmental Services in Indianapolis, Indiana for disposal. The storm water system was inspected the next day and found to be free of any contamination. RAI was unable to obtain specific information about the oil released from this incident.

2.5 REGULATORY HISTORY

On August 12, 1980 GE filed a Notification of Hazardous Waste Activity designating the company as a hazardous waste generator and treatment/storage/disposal facility [GE, 1980a]. This notification included the description of wastes involved in the hazardous waste activity as follows: F001, F003, F004, F006, F008, F010, F013, F017, and F018 (Non-Specific Source Hazardous Waste); U052, U054, U057, U123, U154, U171, U188, U220, and U239 (Commercial Chemical Hazardous Wastes); and ignitable and corrosive characteristics (Non-Listed Hazardous Wastes). On November 12, 1980 a RCRA Part A permit application was filed stating that 17,820 pounds of F001 waste; 72,000 pounds of F003 waste; 81,312 pounds of F004 waste; 270,000 pounds of F006 waste; 33,000 pounds of F008 waste; and 440 pounds of F010 waste were generated



General Electric Company
Taylor Street Facility
Fort Wayne, Indiana

Figure 8
GENERAL LAYOUT OF STORM AND SANITARY SEWERS AS WELL AS NPDES OUTFALLS

Approximate Scale: 1" = 330'
Source: General Electric Company, 1991b

Resource Applications, Inc.

GENERAL ELECTRIC COMPANY— TAYLOR STREET PLANT

GENERAL LAYOUT OF STORM AND SANITARY SEWERS

for three coal-fired, power boilers which generate 100,000 pounds of steam per hour. Three permits are for the Motor Magnet Wire Enameling Operation. These permits include emissions released from three C-Range Ovens, 11 H-Range Ovens, eight Mag H-Range Ovens, 13 I-Range Ovens, 37 M-Range Ovens, and ten Mag V-Range Ovens. GE also has a permit for its painting operations and varnish ovens. These permits expired on April 4, 1990. GE reapplied for these permits in January of 1990 and has been informed that operations may continue under the previous valid permits until a new permit is issued.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the GE facility.

2.6.1 Climate

Allen County has a temperate, humid, continental climate characterized by hot summers and cold, humid winters. The average daily temperature in Fort Wayne, Indiana, the National Weather Service station, is 50.3°F but the range in temperature from summer to winter is wide. The average daily maximum temperature is 85.1°F in July and the average daily minimum temperature is 19.6°F in January [Ruffner, 1978].

The mean annual precipitation is 35.80 inches and net annual precipitation is 3.8 inches [USDC, 1968]. The maximum 1-day, 24-hour rainfall was 4.60 inches in 1950 [Ruffner, 1978]. Precipitation is fairly well distributed throughout the year but is slightly greater in summer than in the other months. Soils are frozen approximately 3-4 months per year. The average seasonal snowfall is 29.7 inches.

Relative humidity averages approximately 70 percent. Prevailing winds are from the southwest at 10.3 miles per hour. The average wind speed is highest in March at 12.2 miles per hour from the west.

2.6.2 Flood Plain and Surface Water

The St. Mary's River is the primary drainage channel near the site. The St. Mary's River flows north and east to its confluence with the St. Joseph River approximately 1.5 miles to the northeast, where they become the Maumee River. The divide between the Lake Erie watershed and the Mississippi River watershed is located approximately 2 miles west of the site.

Mirror Lake is approximately one mile northwest of the facility and Schoaff Lake is over two miles to the north. A lowland area and the Graham McCulloch Junk Ditch is less than one-half mile west and southwest of the site. The St. Mary's River is immediately adjacent to the facility. The site locale is classified as a Zone AE flood plain, that is, an area inside the 100-year flood plain where the base flood elevations is determined [FEMA, 1990].

2.6.3 Geology and Soils

The predominantly limestone and dolomite bedrock in Allen County was deposited in an ancient sea basin centered in Michigan. The rocks are distributed in east-westward-trending bands which represent the intersection of the bedrock surface with the edge of the slightly northeastward-dipping strata. Bedrock units underneath the facility are primarily Devonian and Silurian in age with discontinuous pockets of Mississippian black shale. The principal units are the Devonian Traverse and Detroit River Formations composed predominantly of limestone and dolomite. The total thickness of the sedimentary rock column is approximately 3,000 feet above the Precambrian basement. The Cambrian rocks consist of predominantly sandstones, interbedded sands, and dolomites. Ordovician, Silurian, and Devonian rocks are primarily dolomites and limestones.

The near surface unconsolidated materials are mostly glacial in origin and reflect glacial and glacial lake or stream deposition. The materials include clays, sands, and gravels. These deposits are less than 40 feet to more than 300 feet thick and cover an erosional surface developed on the bedrock.

The surface deposits under the site are glacial outwash deposits of gravel, sand, and silt, and glacial lake deposits of mostly clays and silt. These units comprise part of the Atherton Formation.

The soil in the area of the facility is classified as Lenawee-Montgomery-Rensselaer soil association [USDA SCS, 1969]. These soils are deep, very poorly drained, nearly level, moderately coarse-textured soils on uplands and stream terraces. The two specific soils at the facility are the Lenawee Silty Clay Loam and the Rensselaer Silt Loam. Lenawee soils have an 8-inch surface layer of firm silty clay loam and up to 37 inches of clay loam subsoil. Rensselaer soils have a 14-inch surface layer of friable silty clay loam and 37 inches of sandy clay loam subsoil. These soils are level or nearly level and wetness is a problem in areas without adequate drainage. The parent material for these soils is outwash material of Wisconsin age.

2.6.4 Ground Water

Except for municipal supplies from impoundment of the St. Joseph River, private, public, and industrial supplies in Allen County are derived from ground water. Aquifers in unconsolidated sediments are not uniformly distributed. Where these higher drift aquifers are not available or suitable for use, bedrock supplies must be used [Bleuer and Moore, 1978].

The water supply for Fort Wayne and New Haven is taken from the St. Joseph River at a reservoir near Cedarville. The river is fed mainly from surface water. Smaller communities, rural areas, and some industrial facilities depend on ground water.

Allen County is underlain by a sequence of approximately 3,000 feet of sedimentary rocks ranging in age from Cambrian to Quaternary. Some ground water is produced from rocks of each age. In the vicinity of the facility, the depth to the top of bedrock is approximately 65 feet and the principal sources of ground water occur within the upper 400-600 feet of rocks. In Allen County, the hydrologic system consists of aquifers of two types: glacial drift aquifers and carbonate bedrock aquifers. Ground water flow in the vicinity of the site converges on the valleys of St. Mary's River, St. Joseph River, and Maumee River. The potentiometric surface at the site is approximately 760 feet above mean sea level and falls to about 720 feet in the Maumee River valley, a distance of 12 miles to the east.

In Allen County there are four primary aquifers. The Silurian/Devonian System consists of limestones and dolomites and forms a deep aquifer. Water in this aquifer fills pore spaces and fracture planes in the carbonate rock. The aquifer underlies the glacial drift across the county, but at depths from 0-200 feet. Ground water flow is from south to north in this confined aquifer.

The bedrock is overlain by unconsolidated rocks of Quaternary age which are locally up to 200 feet thick. These rocks are chiefly the result of glaciation and are divided into three aquifers, two of which are confined. The lowest drift aquifer is medium to fine sands and/or gravel of the Atherton Formation. Production from this unit is limited because it is often too fine grained and slowly permeable. The next lowest unit is a medium to fine dense sand, pea gravel, and some coarse gravel. This uppermost confined drift aquifer is also within the Atherton Formation. A thick saturated sand and gravel unconfined aquifer is comprised of Martinsville and Atherton Formations. This is the uppermost aquifer in the county but is used most often in the St. Joseph River and Eel River valleys. Elsewhere, the gravels are relatively thin and separated from lower aquifers by slowly permeable clays [Bleuer and Moore, 1978].

There are four wells within two miles of the facility. All four wells are used for industrial purposes. There are no municipal or private wells within two miles of the facility. All are bedrock wells and upgradient to the facility. Consequently, the potential for contamination of these wells by the facility is low. The nearest well is approximately one half mile southwest of the facility.

2.7 RECEPTORS

The GE facility on Taylor Street is in a quarter mile square industrial area in central Fort Wayne, Indiana (Figure 1). The population of Fort Wayne is approximately 172,000. The facility is bordered on the east by the St. Mary's River and the Essex Group, Chemical Processing Plant, on the west by the New York and St. Louis Railroad and the Slater Steel Corporation Plant, on the north by Swinney Park (a Fort Wayne city park), and on the south by residential property. Residential areas are located about a quarter of a mile east and south of the facility. The nearest school is one half mile to the south. The facility is surrounded by a chain link fence. Access to GE is restricted to one guarded entrance. The facility has a security team which works 24 hours a day. The facility also has a fireman on duty at all times who also works as part of the security team. A Fort Wayne city park, used primarily for recreation is located within a quarter of a mile south of the facility. St. Mary's River is located an eighth of a mile east of the facility. There are no wetlands, no habitats of endangered species and no other sensitive environments within two miles of the site.

Drinking water is supplied by the St. Mary's River and treated by Fort Wayne's municipal water system. There are four upgradient potable ground water wells within a two mile radius of the site. Smith Field Airport is approximately four miles north of the facility. The GE facility currently discharges all sanitary sewage and process wastewater into the Fort Wayne sewer system. Storm water drains into a separate storm water system which is circulated through one of three monitoring stations before flowing into the St. Mary's River.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the eleven SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and RAI observations.

SWMU 1 **Hazardous Waste Satellite Accumulation Areas**

Unit Description: Most of the wastes accumulated in one of these areas are in 55-gallon steel drums. However, wastes are also contained in 1-gallon galvanized steel pails, 2-gallon steel cans, 5-gallon steel cans; 10-gallon steel cans, 15-gallon, plastic lined, steel garbage cans, 30-gallon polypropylene drums; 30-gallon steel drums, and several sizes of steel dumpsters (Photos 1 and 2). When the containers become full, they are taken to the Hazardous Waste Storage Area #1 (SWMU 8). Hazardous Waste Satellite Accumulation Areas consist of primary and secondary sub-units. The primary sub-units accumulate small quantities of waste in containers under 30 gallons directly from the process which generates it. The secondary units accumulate the primary units waste when these latter sub-units' containers become full. These secondary sub-unit containers hold between 30 to 55 gallons of waste. When the secondary sub-units containers become full, the containers are transferred to the Hazardous Waste Storage Area (SWMU 8). TCA-contaminated solid waste is accumulated in small 5-gallon garbage cans in over a hundred work cubicles. Once a day these garbage cans are emptied into a 30-gallon polypropylene drum. This drum is then taken and emptied into a 9-cubic yard steel dumpster in Hazardous Waste Storage Area #2 (SWMU 11).

Date of Startup: 1942

Date of Closure: These units are currently active.

Wastes Managed: Spent methylene chloride/F002; waste sodium hydroxide stripping solution/D002; liquid enamels/F002, F003, F004; solid enamels/F003;

liquid fluorocarbon solvents/F002; fluorocarbon solvent-contaminated wipes and solids/F002; 1,1,1-trichloroethane (TCA)/F002; trichlorotrifluorethane (Genesolv)/F002; solder dross/D008; spent paint/F003; spent thinners/F003; spent xylene/F003; paint sludge/F001; spent naphtha/D001; obsolete laboratory materials and lab packs/D002, D005, F002, F003, F005; spent methyl pyrrolodine/D001; cutting oils/F003; cooling tower sludge/D006; spent organic varnish/D001; barium salt waste/D005, PCB-contaminated solvents/(special), F003; and PCB-contaminated oil/(special).

Release Controls:

Most of these units rest on a wood block floor that is placed upon eight inches of concrete. Others have had the wood block floor removed and replaced with four additional inches of concrete. Others still are inset within a 2-inch deep trough within the floor, often lined with plastic. Then rollers are set within this trough. The containers are then set on the rollers. All containers within these accumulation storage areas are indoors. Most of the containers are closed, but some of the solid hazardous waste containers are not.

History of Documented Releases:

No releases have been documented at these units.

Observations:

Over 200 of these units were observed in sound condition. All observed waste containers had waste labels.

SWMU 2

Non-hazardous Waste Satellite Accumulation Areas

Unit Description:

These units vary in size. They are as large as 20 feet by 20 feet or as small as one foot by one foot (Photos 3 and 4). All are within close proximity to the outlets of the processes where the wastes are generated. Most of the waste accumulated in these areas are in 55-gallon steel drums. However, wastes are also contained in 1-gallon galvanized steel pails, 2-gallon steel cans, 5-gallon steel cans; 10-gallon steel cans, 15-gallon plastic lined, steel garbage cans, 30-gallon polypropylene drums; 30-gallon steel drums, and several sizes of steel

dumpsters. When the containers become full, they are taken to the Non-hazardous Waste Storage Area (SWMU 7).

Date of Startup: 1942

Date of Closure: These units are currently active.

Wastes Managed: Spent aluminum and copper drawing compound; aluminum sludge; aluminum filters; copper sludge; copper filters; old forklift batteries; spent water-soluble varnish; grinding sludge; grinding swarf; steel shot; scrap aluminum; scrap copper; spent propylene glycol antifreeze; and used oils.

Release Controls: Most of these units rest on a wood block floor over eight inches of concrete. Others have had the wood block floor removed and replaced with four additional inches of concrete. Others still are inset within a 2-inch deep trough within the floor. Often it is lined with plastic. Then rollers are set within this trough. The containers are then set on the rollers. All containers within these accumulation storage areas are indoors.

History of Documented Releases: No releases have been documented at this unit.

Observations: Over 100 of these units were observed in sound condition. All observed waste containers had waste labels.

SWMU 3 **Non-hazardous Waste Storage Tanks**

Unit Description: This unit is approximately 30-feet by 50-feet. It contains two fiberglass, 7,000-gallon, storage tanks (Photo 5). These storage tanks hold non-hazardous drawing wire compound. The wire drawing process pulls wire through various sizes of dies. The wire is stretched and cut to various diameters. The wire drawing compound is used as a lubricant in this process. The waste lubricant is pumped by pressure through pipes to

	the storage tanks.
Date of Startup:	1951
Date of Closure:	This unit is currently active.
Wastes Managed:	Spent aluminum drawing compound and spent copper drawing compound.
Release Controls:	The unit has a fiberglass-lined floor and a 1-foot thick and 5 1/2-foot tall concrete berm.
History of Documented Releases:	No releases have been documented at this unit.
Observations:	At the time of the VSI, the unit appeared to be in sound condition.
SWMU 4	**Former Wastewater Treatment Plant**
Unit Description:	This former unit was the wastewater treatment plant for the zinc and chrome plating operation (Figure 6 and Photo 6). The facility no longer generates D006 chrome reduction sludge or D002 plating bath sludge from zinc and chrome plating. The zinc and chrome plating processes were discontinued in 1985. Zinc and chrome plating wastewater and sludge were treated together in one process. Figure 6 shows a diagram of this former plating process and its wastewater treatment plant. The unit was approximately 16 1/2-feet wide and 38-feet long.
Date of Startup:	1974
Date of Closure:	This unit is inactive. This unit was removed in 1985 when the zinc plating operation was discontinued.
Wastes Managed:	Chrome reduction sludge/D006, plating bath sludge/D002 and wastewater.

Release Controls:	The unit had a 6-inch thick, reinforced concrete floor. Some of the sub-units had B.F. Goodrich Koroseal Lok-Rib Tank Liners. These liners also covered any walls where there could possibly have been overflow.
History of Documented Releases:	No releases have been documented at this unit.
Observations:	The area where this unit was is now GE's product testing facility for the Aircraft Control Systems Department. No evidence of the former unit exists.
SWMU 5	**Former Hazardous Waste Storage Area**
Unit Description:	This unit is a 29-foot by 25-foot area (Photo 7). This unit stored all hazardous wastes before 1987. Most of the wastes were stored in 55-gallon steel drums on wooden pallets. The unit had a reinforced concrete pad that was sloped toward a storm water drain in the center of the pad. This drain was connected to a drain line that emptied into a 15,000-gallon, steel underground surge tank. This surge tank was part of the facility's storm water drainage system. When sufficient quantities of storm water were collected, the storm water was released into an oil/water separator sub-unit. The skimmed waste was piped to one of two 1,000-gallon USTs (SWMU 6).
Date of Startup:	1945
Date of Closure:	This unit is inactive. Closure of the unit was approved by EPA on January 14, 1991.
Wastes Managed:	Methylene chloride/F002; waste sodium hydroxide stripping solution/D002; liquid enamels/F002, F003, F004; solid enamels/F003; liquid fluorocarbon solvents/F002; fluorocarbon solvent-contaminated wipes and solids/F002; 1,1,1-trichloroethane (TCA)/F001, F002;

trichlorotrifluorethane (Genesolv)/F002; solder dross/D008; spent paint/F003; spent thinners/F003; spent xylene/F003; paint sludge/D001; spent naphtha/D001; obsolete laboratory materials and lab packs/D002, D005, F002, F003, F005; spent methyl pyrrolidine/D001; cooling tower sludge/D006; spent propylene glycol antifreeze; spent organic varnish/D001; barium salt waste/D005, waste oils/D001; PCB-contaminated solvents/(special), F003; and PCB-contaminated oil/(special).

Release Controls:

The unit had a reinforced concrete pad that was sloped toward a storm water drain in the center of the pad. The unit had no secondary containment that would prevent released waste material stored on the pad from entering the storm water drain. Soil sampling was performed a foot beneath the pad during closure proceedings. Subsurface sampling was not done to determine hazardous constituent contamination via the drain line and/or the underground surge tank. The USTs had no secondary containment. PID results and visual inspection indicated that no contamination was found [GE, 1991c].

History of Documented Releases:

It was noted in an IDEM memorandum that 1,1,1-trichloroethane was detected in the effluent at NPDES Outfall 002 on May 1, 1986. Representatives of GE believed that it was caused by runoff from this unit into GE's storm water drainage system.

Observations:

Currently the unit is part of the Non-hazardous Waste Storage Area (SWMU 7). Approximately fifty 55-gallon steel drum filled with non-hazardous waste were observed on this former unit. This unit appeared sound and there was no evidence of release.

SWMU 6

Former Used Oil Underground Storage Tanks

Unit Description:

This unit consisted of two 1,000-gallon USTs and one oil/water separator. UST No. 6 was 40 years old when it was removed in 1988. The construction of this tank is unknown. This UST was last used in

June of 1975. UST No. 7 was ten years old when it was removed in 1988 and was constructed of steel. Wastewater from SWMU 5's surge tank was piped to the oil/water separator sub-unit. This oil/water separator was also removed in 1988 (Figure 7). Facility representatives could not provide the exact dimensions of the oil/separator unit. After separation, all separated oil was piped to one of the two USTs. When the USTs became full, the solid waste was pumped into a tanker truck and taken off-site for reclamation. The wastewater/stormwater was allowed to drain into the St. Mary's River at NPDES Outfall 002 via the facility's stormwater drainage system. Attachment C provides PID results obtained during UST removal.

Date of Startup: 1945

Date of Closure: These units are inactive. These units were removed in 1988.

Wastes Managed: Methylene chloride/F002; waste sodium hydroxide stripping solution/D002; liquid enamels/F002, F003, F004; solid enamels/F003; liquid fluorocarbon solvents/F002; fluorocarbon solvent-contaminated wipes and solids/F002; 1,1,1-trichloroethane (TCA)/F001, F002; trichlorotrifluorethane (Genesolv)/F002; solder dross/D008; spent paint/F003; spent thinners/F003; spent xylene/F003; paint sludge/D001; spent naphtha/D001; obsolete laboratory materials and lab packs/D002, D005, F002, F003, F005; spent methyl pyrrolidine/D001; cooling tower sludge/D006; spent propylene glycol antifreeze; spent organic varnish/D001; barium salt waste/D005, waste oils/D001; wastewater; PCB-contaminated solvents/(special), F003; PCB-contaminated oil/(special).

Release Controls: The oil/water separator unit's materials of construction are not known, as was the case with UST No. 6. UST N0. 7 was constructed of steel and had a painted exterior. These units had no secondary containment.

History of Documented Releases: It was noted in an IDEM memorandum that 1,1,1-trichloroethane was

detected in the effluent at NPDES Outfall 002 on May 1, 1986. Representatives of GE believed that it was caused by runoff from SWMU 5 that released into the oil/water separator and possibly the USTs.

Observations: No evidence of these units currently exist.

SWMU 7 **Non-hazardous Waste Storage Area**

Unit Description: This unit is approximately 330 feet by 530 feet (Figure 4 and Photos 7, 8, and 9). This unit consists of several 3-walled bins for various types of scrap metal, defective parts, and process debris. It also contains a non-hazardous waste drum storage area that started up in 1987. This non-hazardous waste drum storage area is a 29 foot by 25 foot area. It stores all non-hazardous waste containers that are full. It previously was the Hazardous Waste Storage Area (SWMU 5).

Date of Startup: 1945

Date of Closure: This unit is currently active.

Wastes Managed: Spent aluminum and copper drawing compound; aluminum sludge; aluminum filters; copper sludge; copper filters; old forklift batteries; spent water soluble varnish; grinding sludge; grinding swarf; steel shot; scrap aluminum; scrap copper; and used oils.

Release Controls: This unit has a reinforced concrete floor. The concrete pad is approximately half a foot higher than the surrounding paved surface. The scrap bins are walled on three sides with reinforced concrete. No drains were noted. The former hazardous waste drum storage area, currently used as a Non-hazardous Waste Storage, has a reinforced concrete pad that is sloped toward a storm water drain in the center of the pad. This drain is connected to a drain line that empties into a 15,000-gallon underground surge tank. When the surge tank becomes full, it is released into the St. Mary's River at Outfall 002 GE's storm water drainage system.

History of Documented Releases: No releases have been documented at this unit.

Observations: Various types of metal scrap including, aluminum wire, old defective motors, scrap aluminum, empty crates, and defective tote boxes were observed within the bins at this unit. Also observed were approximately fifty, 55-gallon non-hazardous waste drums located in the new non-hazardous waste storage area. Also observed were various crane and forklift parts, metal shafts and dozens of empty 55-gallon drums. Also, two 9-cubic yard steel gondolas were observed with metal grinding swarf. All sub-units appeared sound. In some places the concrete is cracked extensively.

SWMU 8 **Hazardous Waste Storage Area #1**

Unit Description: This unit consists of four structures. The Oil House (Figure 5) contains all product wire enamels, paints, xylene, mineral spirits, and flux in 55-gallon steel drums. The Oil House Annex contains all product flammables, oils, solvents, and TCA in 55-gallon steel drums on metal, three-tiered, steel racks. The Oil House Annex also stores waste powder paint blocks. The Hazardous Waste Storage House contains all hazardous waste. The waste is stored in 55-gallon steel drums and placed on three-tiered steel racks (Photo 11). Some 20-gallon steel drums containing waste were also observed in this structure. This hazardous waste is stored for less than 90 days. The fourth structure is canopied. It covers a 10-foot by 25-foot by 4-foot concrete basin which holds condensate from several Wire Mill processes (Photo 10). This wastewater is monitored and tested before being released into the Fort Wayne Sanitary Sewer System. All hazardous waste is stored for less than 90 days.

Date of Startup: 1951; the Hazardous Waste Storage House began storing hazardous waste in 1987.

Date of Closure: This unit is currently active.

Wastes Managed: Methylene chloride/F002; waste sodium hydroxide stripping solution/D002;

liquid enamels/F002, F003, F004; solid enamels/F003; liquid fluorocarbon solvents/F002; fluorocarbon solvent-contaminated wipes and solids/F002; 1,1,1-trichloroethane (TCA)/F001, F002; trichlorotrifluorethane (Genesolv)/F002; solder dross/D008; spent paint/F003; spent thinners/F003; spent xylene/F003; paint sludge/D001; spent naphtha/D001; obsolete laboratory materials and lab packs/D002, D005, F002, F003, F005; spent methyl pyrrolodine/D001; cooling tower sludge/F006; spent propylene glycol antifreeze; spent organic varnish/D001; barium salt waste/D005, non-hazardous powder paint waste; PCB-contaminated solvents/(special), F003; and PCB-contaminated oil/(special).

Release Controls:

The Hazardous Waste Storage House is a tin-sided structure. The foundation was poured as a single unit. It has a 2-foot berm on the north side of the structure and a 4-inch berm on the south side of the structure. A 1-foot high ramp leads into and out of the structure. The structure's foundation has the total capacity of 60% more than the release of the maximum amount of waste volume that the structure can hold.

History of Documented Releases:

No releases have been documented at this unit.

Observations:

At the time of the VSI, the unit looked sound and no releases were observed.

SWMU 9

Non-hazardous Flyash Waste Storage Area

Unit Description:

This unit consists of a 15-foot by 30-foot structure that houses two conveyors that dump wet and dry flyash into 5-cubic yard, plastic-lined, steel dumpsters (Photo 12). These wastes were referenced to be non-hazardous by IDEM on August 7, 1984. (IDEM, 1984) This structure serves as an accumulation area for the wet flyash waste and as the dry flyash storage area. Outside this structure is a second 5-cubic yard, steel dumpster which sits on coal-covered soil. This structure is used as the wet flyash storage area. Forty feet to the south of this structure is the remains of the former wet flyash storage area. At one time, wet flyash was vacuumed out of a basin below ground that held this waste. The

wet flyash was vacuum pumped from former wet flyash storage area into trucks and then sent as a byproduct material for roadbed and landfill fill material. Coal is used to feed the power plant. The coal yard lies east of this area.

Date of Startup: 1942

Date of Closure: This unit is currently active.

Wastes Managed: Wet and Dry Flyash.

Release Controls: The structure has a concrete floor. The dumpster on the outside of the structure sits on coal-covered soil.

History of Documented Releases: It was noted in an IDEM memorandum that NPDES Outfall 001 effluent exhibited high levels of dissolved iron, total iron, aluminum, oil and grease, and total suspended solids [IDEM, 1986]. The sources of these releases were investigated and they were believed to be caused by runoff from the coal storage area. In December of 1987 this runoff was routed to the Fort Wayne Sanitary Sewer System.

Observations: At the time of the VSI, the dumpsters were in sound condition. Flyash was present on the floor of the structure. No other release was observed.

SWMU 10 **Former Used Oil Underground Storage Tank**

Unit Description: UST No. 13 was a steel tank; had a capacity of 150 gallons; was 44 years old; and, stored used oil prior to June of 1984.

Date of Startup: 1943

Date of Closure: This unit is currently inactive. The UST was removed in 1988.

Wastes Managed:	Used Oil
Release Controls:	The unit had no secondary containment. No further information was known by facility representatives.
History of Documented Releases:	No releases have been documented at this unit. Attachment C provides PID results obtained during the UST removal that indicate that no volatile constituents from this unit were detected after its removal.
Observations:	This unit no longer exists. The area is currently covered with asphalt pavement.
SWMU 11	**Hazardous Waste Storage Area #2**
Unit Description:	This indoor unit is a 30-foot by 10-foot area which manages hazardous waste contaminated rags, cardboard, defective circuit boards, and paper towels. This unit holds a 9-cubic yard steel dumpster which contains the above mentioned wastes. The wastes are brought from Hazardous Waste Satellite Accumulation Areas (SWMU 1) in various size drums. The drums are emptied and reused. TCA-contaminated wipes are transferred to this area in 30-gallon polypropylene drums (Photo 13) from SWMU 1 and emptied into the steel dumpster. All hazardous waste is stored for less than 90 days.
Date of Startup:	1985
Date of Closure:	This unit is currently active.
Wastes Managed:	TCA and fluorocarbon-contaminated solids (F002) including rags, paper towels, cardboard and defective circuit boards.
Release Controls:	The unit is open only during compacting. The unit had no secondary containment.

History of
Documented Releases: No releases have been documented at this unit.

Observations: At the time of the VSI, the dumpster appeared to be full. An empty 30-gallon polypropylene drum was observed on the loading dock next to dumpster label stated that it had contained TCA contaminated rags.

4.0 AREAS OF CONCERN

RAI identified three AOCs during the PA/VSI. These are discussed below.

AOC 1 **Former Underground Product Storage Tanks**

Nine commercial product USTs were removed and one commercial product UST was closed in place at the facility (Figure 7) [GE, 1986a, 1991b]. Table 3 identifies each UST's characteristics. Of the 10 removed/closed in place USTs, only one exhibited signs of leakage. Leakage was determined via visual inspection and the use of a photoionization detector (PID). High levels of volatiles were detected around UST Nos. 8 through 11 which had held kerosene, xylene and new oil prior to May of 1982 (Photo 14). These USTs were located next to the Hazardous Waste Storage Area and Oil House within the Hazardous Waste Storage Area #1 (SWMU 8). GE claims that only UST No. 11 contributed to contaminated-soil found during the UST removal. The only visible evidence of the UST removal in this area is an open pit filled with rain water. GE is currently studying the problem. Attachment C contains PID results performed during UST removal. Since the sampling method only tests ambient air, rather than soil, it is possible for leakage to have occurred at some of the other USTs at greater depths. Thus this is an AOC because the soil may still be a source of contamination to ground water. Also, the contamination that was discovered around UST No. 11 still has not been remediated.

AOC 2 **Enamel House**

GE's Enamel House is a 60-foot by 16-foot, one story structure with an oversized basement (Photos 15-19). Tanker trucks unload commercial enamel product into an inlet pipe leading into this structure. Each type of enamel is separated into its own filtering system before it is piped to the Wire Mill manufacturing area. The basement of the structure has two rooms. The first room transfers enamels to the Wire Mill manufacturing area via steel pipes. This room has a concrete floor that is in poor

TABLE 3

UNDERGROUND STORAGE TANK DESCRIPTIONS WITHIN AOC 1

UST	Capacity (gallons)	Construction	Product	Age (years)	Date Last Used
1	10,000	Steel	Diesel	12	July 1988
2	10,000	Steel	Diesel	12	July 1988
3	10,000	Steel	Diesel	12	July 1988
4	10,000	Steel	Gasoline	12	July 1988
5	1,000	Steel	New Oil	12	July 1988
8	12,350	Steel	Kerosene	44	May 1982
9	10,250	Steel	Xylene	44	May 1982
10	15,000	Steel	New Oil	44	May 1982
11	15,000	Steel	New Oil	44	May 1982
12	15,000	Steel	New Oil	44	May 1982

Note:

* USTs Nos. 6, 7, and 13 are SWMUs and are discussed in Sections 2.3 and 3.0.

(Source: GE, 1986a)

condition. Groundwater has seeped into the basement and mixed with enamel and other unknown substances on the floor in a grayish-green liquid. Concern arises if the enamel constituents mix with the ground water seepage and seeps out elsewhere. This room connects with the an enamel filtering room. Enamel product is filtered to GE's specifications. The floor in this area is wood block. In several spots the wood block flooring is missing. The foundation under the wood block is unknown, since this structure was not built at the same time as the main facility. Enamel drippings and leakage are seen throughout the structure. Further concern arises if the foundation is fractured as badly as the wood block floor. Asbestos insulation was observed and identified by facility representatives on some of the piping. This insulation is exposed to air in several places.

AOC 3

Diesel Fuel Release Area

GE has a diesel fuel pumping station exterior to the Oil House Annex in the Hazardous Waste Storage Area #1 (SWMU 8). The tank itself is an above ground unit within the Oil House Annex. There is heavy staining of the asphalt pavement near this pump which may indicate a systematic release over time (Photo 20). To the north of this diesel pumping station is an 15-foot by 8-foot open pit where product USTs were removed in 1988. This open pit is five feet deep and contains rainwater. The asphalt pavement which is stained slopes toward this open pit. The concern arises if the systematic release of diesel fuel flows into the pit and thence into the soil.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified eleven SWMUs and three AOCs at the GE facility. Background information on the facility's location, operations, waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is discussed in Section 3.0. The AOC is discussed in Section 4.0. Following are RAI's conclusions and recommendations for each SWMU and AOC. Table 4 identifies the SWMUs and AOC at the GE facility and suggested further actions.

SWMU 1 **Hazardous Waste Satellite Accumulation Areas**

Conclusions: These units vary in size. They are as large as 20 feet by 20 feet or as small as one foot by one foot. All are within close proximity to the outlets of the processes where the wastes are generated. The wastes are in various types of containers up to a 55-gallon capacity. All of these units are indoors. Over 200 of these units were observed in sound condition. All observed waste containers had waste labels. The threat of release via various pathways is summarized below.

Ground water: Low. The units are on either on an 8-inch concrete foundation with a wood block floor or on a 12-inch concrete foundation. All of these units are indoors. A release can be contained before it has the opportunity to enter the ground water.

Surface water: Low. A release can be contained before it has the opportunity to reach the nearest surface water (.125 miles east).

Air: Low. Some of the wastes are toxic by inhalation, but since the wastes are in sound containers and indoors, the potential threat of release to the environment is low.

On-site soil: Low. The nearest open soil is outside the facility. Any release can be contained before it has the opportunity to enter the soil.

TABLE 4

SWMU AND AOC SUMMARY

SWMU	Operational Dates	Evidence of Release	Suggested Further Action
1. Hazardous Waste Satellite Accumulation Areas	1942 to present	None	No further action is recommended at this time.
2. Non-hazardous Waste Satellite Accumulation Areas	1942 to present	None	No further action is recommended at this time.
3. Non-hazardous Waste Storage Tanks	1951 to present	None	No further action is recommended at this time.
4. Former Wastewater Treatment Plant	1974 to 1985	None	No further action is recommended at this time.
5. Former Hazardous Waste Storage Area	1942 to 1991	TCA was found in NPDES Outfall 002 from a release from this unit in May of 1986	The subsoil should be sampled for hazardous constituents around this unit's drain system and the underground surge tank.
6. Former Used Oil Underground Storage Tanks	1944-1988	TCA was found in NPDES Outfall 002 from a release from this unit in May of 1986	The subsoil should be sampled for hazardous constituents around the UST locations and the oil/water separator.
7. Non-hazardous Flyash Waste Storage Area	1942 to Present	None	No further action is recommended at this time.

TABLE 4 (CONTINUED)
SWMU AND AOC SUMMARY

SWMU	Operational Dates	Evidence of Release	Suggested Further Action
8. Hazardous Waste Storage Area #1	1951 to present	None	No further action is recommended at this time.
9. Nonhazardous Flyash Waste Storage Area	1942 to present	High levels of iron aluminum, oil and grease and total suspended solids was found in NPDES Outfall 001 from coal yard adjacent to this unit in May of 1987.	No further action is recommended at this time.
10. Former Used Oil Underground Storage Tank	1944 to 1988	None	Additional soil sampling is recommended at the former UST location for petroleum contamination.
11. Hazardous Waste Storage Area #2	1985 to Present	None	No further action recommended at this time.

TABLE 4 (CONTINUED)
SWMU AND AOC SUMMARY

AOC	Operational Dates	Evidence of Release	Suggested Further Action
1. Former Underground Product Storage Tanks	1944 to 1988	High levels of volatiles were registered after UST No. 11 was removed in 1988.	Additional soil sampling is recommended at former UST locations to determine if petroleum and/or solvent contamination exists. Contamination around UST #11 should be remediated.
2. Enamel House	1951 to Present	Enamel spillage ground water seepage, and exposed asbestos fibers were observed at Visual Site Inspection.	The foundation should be inspected and the soil near it sampled to determine if the migration of constituents has escaped into the environment. The facility needs to abate the exposed asbestos on pipes.
3. Diesel Fuel Release Area	1991	Heavy staining of asphalt observed during Visual Site Inspection.	The soil beneath the asphalt and the soil north of the area should be tested for petroleum constituents. The water in the pit (AOC 1) that lies adjacent to the area should be tested for petroleum constituents.

Recommendations: No further action is recommended at this time.

SWMU 2 **Non-hazardous Waste Satellite Accumulation Areas**

Conclusions: These units vary in size. They are as large as 20 feet by 20 feet or as small as one foot by one foot. All are within close proximity to the outlets of the processes where the wastes are generated. The wastes are in various types of containers up to a 55-gallon capacity. All of these units are indoors. Over 100 of these units were observed in sound condition. All observed waste containers had waste labels. The threat of release via various pathways is summarized below.

Ground water: Low. The units are on either on an 8-inch concrete foundation with a wood block floor or on a 12-inch concrete foundation. All of these units are indoors. A release of non-hazardous material can be contained before it has the opportunity to enter the ground water.

Surface water: Low. A release can be contained before it has the opportunity to reach the nearest surface water (.125 miles east).

Air: Low. Since the wastes are in sound containers, are non-hazardous, and are indoors, the potential threat of release to the environment is low.

On-site soil: Low. The nearest open soil is outside the facility. Any release of non-hazardous material can be contained before it has the opportunity to enter the soil.

Recommendations: No further action is recommended at this time.

SWMU 3 **Non-hazardous Waste Storage Tanks**

Conclusions: This unit is approximately 30 feet by 50 feet. It contains two fiberglass, 7,000-gallon storage tanks. These storage tanks hold non-hazardous drawing wire compound. The unit has a fiberglass-lined, floor and a one foot thick and five

and a half foot tall concrete berm. This unit is in sound condition and is indoors. The threat of release via various pathways is summarized below.

Ground water: Low. The unit has a fiberglass-lined floor and a foot thick and 5 1/2-foot tall concrete berm in sound condition. The unit is indoors. A release can be contained before it has the opportunity to enter the ground water.

Surface water: Low. Since the unit is indoors a release can be contained before it has the opportunity to reach the nearest surface water (.125 miles east).

Air: Low. Since the wastes are in sound tanks, are non-hazardous, and are indoors, the potential threat of release to the environment is low.

On-site soil: Low. The nearest open soil is outside the facility. Any release can be contained before it has the opportunity to enter the soil. The unit only stores non-hazardous material, so there is no opportunity for release of hazardous constituents.

Recommendations: No further action is recommended at this time.

SWMU 4 **Former Wastewater Treatment Plant**

Conclusions: This former unit was the wastewater treatment plant for the zinc and chrome plating operation (Figure 6). This former unit was the wastewater treatment plant for the zinc and chrome plating operation (Figure 6). The facility no longer generates D006 chrome reduction sludge or D002 plating bath sludge from zinc and chrome plating. The zinc and chrome plating processes were discontinued in 1985. The area where this unit once existed is now GE's product testing facility for the Aircraft Control Systems Department. No evidence of the former unit exists. The threat of release via various pathways is summarized below.

Ground water: Past threat - Low. The unit had a 6-foot thick, reinforced, concrete slab. Since the unit was indoors, any release would have been

contained before it had an opportunity to reach ground water. Current threat - Low. The potential threat to ground water is low since the unit no longer exists.

Surface water: Past threat - Low. Since the unit was indoors any release would have been contained before it reached the nearest surface water (.125 miles east). Current threat - Low. The potential threat to surface water is low since the unit no longer exists.

Air: Past threat - Low. Since the unit was indoors any release to the air would have been contained before it reached the outside environment. Current threat - Low. The potential threat to air is low since the unit no longer exists.

On-site soil: Past threat - Low. Since the unit was indoors, any release would have been contained before it had the opportunity to reach the on-site soil. Current threat - Low. The potential threat to on-site soil is low since the unit no longer exists.

Recommendations: No further action is recommended at this time.

SWMU 5 **Former Hazardous Waste Storage Area**

Conclusions: Closure of this unit was approved by EPA on January 14, 1991. This unit was a 29-foot by 25-foot area outdoors. The unit stored all hazardous wastes at the GE facility before 1987. Most of the wastes were stored in 55-gallon steel drums on wooden pallets. The unit had a reinforced concrete pad that was sloped toward a drain in the center of the pad. This drain was connected to a drain line that emptied into 15,000-gallon underground surge tank. Soil sampling was performed a foot below the pad. No subsurface soil sampling was performed around the drain or surge tank. Currently the unit is part of the Non-hazardous Waste Storage Area (SWMU 7). Approximately fifty 55-gallon steel drums filled with non-hazardous waste were observed in this former unit. This unit appeared sound and there was no evidence of release. The threat of release via various pathways is summarized below.

Ground water: Past threat - Moderate to High. Although the unit has gone through closure, there is a moderate to high potential that the underground surge tank and drain may have released hazardous constituents to the soil sometime in the past. If a release did occur, then the soil may still be a potential source of contamination to ground water. Current threat - Low. The potential threat to ground water is low since the unit has been closed and no longer stores hazardous waste.

Surface water: Past threat - Moderate to High. It was noted in an IDEM memorandum that 1,1,1-trichloroethane was detected in the effluent at Outfall 002. Representatives of GE believed that it was runoff from this unit. Current threat - Low. The potential threat to surface water is low since the unit has been closed and no longer stores hazardous wastes.

Air: Past threat - Low. All hazardous waste was stored in this unit in closed steel 55-gallon drums. Current threat - Low. The potential threat to air is low since the unit has been closed and no longer stores hazardous wastes.

On-site soil: Past threat - High. This unit had a reinforced concrete pad that was sloped toward a drain in the center of the pad. The drain was connected to a drain line that emptied into 15,000-gallon underground surge tank. This served as second containment of any spilled materials. Closure activities found no soil contamination from the concrete pad. However no subsurface sampling was done to determine if soil contamination at greater depths has occurred via the drain or the underground surge tank. If contamination is found at greater depths the soil becomes the source of contamination to ground water. Current threat - Low. The potential threat to on-site soil is low since the unit has been closed and no longer stores hazardous wastes.

Recommendations: Subsoil sampling needs to be performed on this unit's drain system and underground surge tank to determine if hazardous constituent contamination has occurred.

SWMU 6 **Former Used Oil Underground Storage Tanks**

Conclusions: This unit consisted of two 1,000-gallon USTs and one oil/water separator. All three units were removed in 1988. Wastewater from SWMU 5 would be released into the oil/water separator. All separated oil was piped to one of the two USTs. When the USTs became full, the solid waste was pumped into a tanker truck and taken off-site for reclamation. The wastewater/stormwater was allowed to drain into the St. Mary's River at NPDES Outfall 002 via the facility's stormwater drainage system. After removal of the USTs, the soil was tested for leakage via visual observation and PID sampling. PID monitoring at 17 points around the three units in this SWMU revealed readings at the 0-5ppm Level [OHM, 1989]. Attachment C includes all sampling results. Since the sampling method used only samples ambient air rather than soil, it is possible for leakage to have occurred at the USTs at greater depths. The USTs had no secondary containment. The threat of release via various pathways is summarized below.

Ground water: Past threat - High. Since these units were old and lacked secondary containment before their removal, it is possible that leakage may have occurred into the soil and into ground water. Current threat - Low. The USTs have been removed.

Surface water: Past threat - Low to Moderate. Since these units were old and lacked secondary containment before their removal, it is possible that leakage had occurred into the soil and ground water. Also since the St. Mary's River lies 1,000 feet to the east of the unit, it is possible that if the ground water had been contaminated, the ground water could have been a source of surface water contamination. Current threat - Low. The USTs have been removed.

Air: Past threat - Low. Due to the nature of the waste and the fact that the tanks were underground, the potential for release to the air is low. Current threat - Low. The USTs have been removed, thus no potential for release exists.

On-site soil: Past threat - High. Since these units were old and lacked

secondary containment before their removal, it is possible that leakage may have occurred into the soil. Current threat - Low. The USTs have been removed.

Recommendations: RAI recommends that GE perform additional soil sampling in the vicinity of these USTs in order to determine if petroleum contamination of the soil had occurred.

SWMU 7 **Non-hazardous Waste Storage Area**

Conclusions: This unit is approximately 330 feet by 530 feet. This unit consists of several three-walled bins for various types of scrap metal, defective parts, and process debris. It also contains a non-hazardous waste drum storage area. This non-hazardous waste drum storage area is a 29-feet by 25-feet area. It stores all non-hazardous waste containers that are full. This area was the Former Hazardous Waste Storage Area prior to 1987. It is discussed as SWMU 5. The scrap bins are walled on three sides with reinforced concrete. No drains were noted. The non-hazardous waste drum storage area has a reinforced concrete pad that is sloped toward a drain in the center of the pad. This drain is connected to a drain line that empties into 15,000-gallon underground surge tank providing secondary containment for the unit. Various types of metal scrap including, aluminum wire, old defective motors, scrap aluminum, empty crates, defective tote boxes were observed within the bins at this unit. Also observed were approximately fifty 55-gallon drums containing non-hazardous waste located in the new non-hazardous waste storage area and various crane and forklift parts, metal shafts and dozens of empty 55-gallon drums. Also, two 30-cubic yard steel gondolas were observed with metal grinding swarf. All sub-units appeared sound. In some places the concrete is cracked. The threat of release via various pathways is summarized below.

Ground water: Low. The unit manages non-hazardous waste, thus the potential of release to environment is low.

Surface water: Low. The potential threat to surface water is low since the unit no longer stores hazardous wastes.

Air: Low. The potential threat to air is low since the unit no longer stores hazardous wastes.

On-site soil: Low. The unit manages non-hazardous waste, thus the potential of release to environment is low.

Recommendations: No further action is recommended at this time.

SWMU 8 **Hazardous Waste Storage Area #1**

Conclusions: This unit consists of four structures: the Oil House, the Oil House Annex, the Hazardous Waste Accumulation Area, and a canopied condensate lagoon. The hazardous waste is stored for less than 90 days in the Hazardous Waste Accumulation Area. The structure's foundation has the total capacity of 60% more than the release of the maximum amount of waste volume that the structure can hold. The threat of release via various pathways is summarized below.

Ground water: Low. Since this unit has adequate secondary containment and is indoors, a release can be contained before it has the opportunity to enter the ground water.

Surface water: Low. Due to the indoor location of the unit and the adequate secondary containment, a release can be contained before it has the opportunity to reach the nearest surface water (.125 miles east).

Air: Low. Since the wastes are in sound and closed containers, and are indoors, the potential threat of release to the air is low.

On-site soil: Low. Since this unit has adequate secondary containment and is indoors, a release can be contained before it has the opportunity to enter the on-site soil.

Recommendations: No further action is recommended at this time.

SWMU 9 **Non-hazardous Flyash Waste Storage Area**

Conclusions: This unit consists of a 15-foot by 30-foot structure that houses two conveyors that dump wet and dry flyash into 5-cubic yard, plastic-lined, steel dumpsters. This structure serves as an accumulation area for the wet flyash waste and as the dry flyash storage area. Outside this structure is a second 5-cubic yard, steel dumpster which sits on coal-covered soil. This structure is used as the wet flyash storage area. Forty feet to the south of this unit is the remains of the former wet flyash storage area. In a report dated May 1, 1986 showing pollutants from GE's three NPDES permitted outfalls into the St. Mary's River, it was noted that Outfall 001 exhibited high levels of dissolved iron, total iron, aluminum, oil and grease, and total suspended solids [IDEM, 1986]. The source of these was investigated and it was believed to be caused by runoff from the coal product storage area, which lies south of this unit. In December of 1986 this run off was routed to the Fort Wayne Sanitary Sewer System. The threat of release via various pathways is summarized below.

Ground water: Low. Due to the proper management and non-hazardous nature of the both wastes, the potential for release to ground water is low.

Surface water: Low. Due to the proper management and non-hazardous nature of both wastes, the potential for release to surface water is low.

Air: Low. Due to the proper management and non-hazardous nature of both wastes, the potential for release to air is low.

On-site soil: Low. Due to the proper management and non-hazardous nature of both wastes, the potential for release to on-site soil water is low.

Recommendations: No further action is recommended at this time.

SWMU 10 **Former Used Oil Underground Storage Tank**

Conclusions: UST No. 13 had a capacity of 150 gallons, was 44 years old, and stored used oil prior to June of 1984. After removal of the UST, the soil was tested for leakage via visual observation and PID sampling. PID monitoring at four points around this SWMU revealed readings at the 0-5ppm Level [OHM, 1989]. Attachment C includes all sampling results from this unit. Since the sampling method used only samples ambient air rather than soil, it is possible for leakage to have occurred at the UST at greater depths. The UST had no secondary containment. The threat of release via various pathways is summarized below.

Ground water: Past threat - High. Since this unit was old and lacked secondary containment before its removal, it is possible that leakage had occurred into the soil and into the ground water. Current threat - Low. The UST has been removed.

Surface water: Past threat - Low to Moderate. Since this unit was old and lacked secondary containment before its removal, it is possible that leakage had occurred into the soil and possibly into the ground water. Also since the St. Mary's River lies 1,000 feet to the east of the unit, it is possible that if the ground water had been contaminated, the ground water could have been a source of surface water contamination. Current threat - Low. The UST has been removed.

Air: Past threat - Low. Due to the nature of the waste, the potential for release to the air is low. Current threat - Low. The UST has been removed, thus no potential for release exists.

On-site soil: Past threat - High. Since this unit was old and lacked secondary containment before its removal, it is possible that leakage had occurred into the soil. Current threat - Low. The UST has been removed.

Recommendations: RAI recommends that GE perform additional soil sampling in the vicinity of this USTs in order to determine if petroleum contamination of the soil had occurred.

SWMU 11 **Hazardous Waste Storage Area #2**

Conclusions: This unit is a 30-foot by 10-foot area which manages hazardous waste contaminated rags, cardboard, defective circuit boards, and paper towels. This unit holds a 9-cubic yard steel dumpster which contains the above mentioned wastes. When the containers for solid hazardous waste at any of the 100 Hazardous Waste Satellite Accumulation Areas (SWMU 1) become full, the waste is dumped into a 30-gallon polypropylene drum and then transferred to this unit. The threat of release via various pathways is summarized below.

Ground water: Low. Due to the solid nature of the waste and its indoor location, the potential for release to ground water is low.

Surface water: Low. Due to the solid nature of the waste and its indoor location, the potential for release to surface water is low.

Air: Moderate. The dumpster is partially exposed to air. The unit,although indoors, is located in a dock area. When the dock doors are open, there is a moderate potential for TCA to volatilize and be released into the outdoor air.

On-site soil: Low. Due to the solid nature of the waste and its indoor location, the potential for release to on-site soil is low.

Recommendations: No further action is recommended at this time.

AOC 1 **Former Underground Product Storage Tanks**

Conclusions: Ten underground product storage tanks (USTs) and an oil/water separator were removed and one product UST was properly closed in place at the GE facility (Figure 7) [GE, 1986a, 1991b]. High levels of volatiles were detected around UST No. 11 which had held new oil prior to May of 1982. High levels of volatiles were also detected at USTs Nos. 8, 9, and 10. These USTs were located next to the the Oil House's Hazardous Waste Storage Area #1 (SWMU 6). The only visible evidence of the UST removal in this area is an open pit

filled with rain water. GE is currently studying the contamination problem.

Recommendations: RAI recommends that GE perform additional soil sampling in the vicinity of this USTs in order to determine if petroleum/solvent contamination of the soil had occurred. Soil contamination around UST No. 11 should be remediated.

AOC 2 **Enamel House**

Conclusions: GE's Enamel House is a 60-foot by 16-foot, one story structure with an oversized basement. Tanker trucks unload commercial enamel product into an inlet pipe leading into this structure. Each type of enamel is separated into its own filtering system before it is piped to the Wire Mill manufacturing area. The basement of the structure has two rooms. The first room has a concrete floor that is in poor condition. Ground water has seeped into the basement and mixed with enamel and other unknown substances on the floor in a grayish-green liquid. The concern arises if the enamel constituents mix with the ground water seepage and seeps out elsewhere. This room connects with the an enamel filtering room. The floor in this area is wood block. In several spots the wood block flooring is missing. The foundation under the wood block is unknown, since this structure was not built the same time as the main facility. Enamel drippings and leakage are seen throughout the structure. Further concern arises if the foundation is fractured as badly as the wood block floor. Asbestos insulation was observed and identified by facility representatives on some of the piping. This insulation is exposed to air in several places.

Recommendations: RAI recommends that GE perform an inspection of the Enamel House foundation to determine if product and waste constituents can migrate into the soil or ground water. RAI also recommends GE sample the soil and ground water around the enamel house to determine if migration of constituents has migrated outside the unit. GE also needs to abate the exposed asbestos fibers from the insulation on some of the enamel pipes.

AOC 3 **Diesel Fuel Release Area**

Conclusions: GE has a diesel fuel pumping station exterior to the Oil House Annex in the Hazardous Waste Storage Area (SWMU 6). The tank itself is an above ground unit within the Oil House Annex. There is heavy staining of the asphalt pavement near this pump which may indicate a systematic release over time. To the north of this diesel pumping station is an 15-foot by 8-foot open pit where product USTs were removed in 1988. This open pit is five feet deep and contains rainwater. The asphalt pavement which is stained slopes toward this open pit. Concern arises if the observed diesel fuel flows into the pit and thence into the soil.

Recommendations: RAI recommends that soil sampling be performed by GE to determine if petroleum contamination of the soil has occurred at the outside diesel pump and the open pit associated with AOC 1. The rain water withheld in the pit should also be sampled for diesel fuel constituents.

REFERENCES

Bleuer, N.K. & Moore, M.C., 1978. "Environmental Geology of Allen County, Indiana". Indiana Department of Natural Resources, Geological Survey Special Report 13.

City of Fort Wayne, 1991a. GE's Fort Wayne Industrial Discharge Permit #IFT03806; January 15.

City of Fort Wayne, 1991b. GE's Fort Wayne Industrial Discharge Permit #IFT03807; January 15.

Environmental Protection Agency (EPA), 1981. Acknowledgement of Notification of Hazardous Waste Activity, September 28.

Federal Emergency Management Agency (FEMA), 1990. National Flood Insurance Program; Flood Rate Insurance Map: City of Indianapolis, Marion County. Community-Panel Number 180003 0260 D. Map revised: September 28, 1990.

General Electric Company (GE), 1980a. Notification of Hazardous Waste, August 12.

GE, 1980b. Part A application for Hazardous Waste, August 12.

GE, 1980c. Amended Part A application for Hazardous Waste permit, November 17.

GE, 1982a. Amended Part A application for Hazardous Waste permit, February 16.

GE, 1982b. Amended Part A application for Hazardous Waste permit, April 26.

GE, 1982c. Amended Part A application for Hazardous Waste permit, July 2.

GE, 1986. Notification for Underground Storage Tanks, May 1.

GE, 1991a. Letter from Denver Sarver (GE) to Mark Mauch (IDEM) re: Water soluble oil spill to storm sewer system; May 8.

GE, 1991b. Conversation between Denver Sarver (GE) and Scott Tajak (RAI) during the RCRA Facility Assessment Visual Site Inspection; November 14.

GE, 1991c. Letter from Denver Sarver (GE) to Scott R. Tajak (RAI) re: NPDES permits and UST sampling results (cover letter).

Indiana Department of Environmental Management (IDEM), 1983a. Letter from Ralph C. Pickard (IDEM) to Denver Sarver (GE) re: Compliance Inquiry Letter (CIL) for the RCRA Compliance Inspection performed April 15, 1983; June 14.

IDEM, 1984. Letter from IDEM to Denver Sarver (GE) re: Informs GE that flyash is non-hazardous.

IDEM, 1986. Briefing memo about NPDES problems at GE; May.

IDEM, 1987. Letter from David D. Lamm (IDEM) to Denver Sarver (GE) re: CIL for the RCRA Compliance Inspection performed on July 22, 1986; January 8.

IDEM, 1989. RCRA Land Disposal Restriction Inspection Report, June 15.

IDEM, 1991a. Letter from H. Martin Harmless II (IDEM) to Denver Sarver (GE) re: Closure of Hazardous Waste Container Storage Area is completed; January 14.

IDEM, 1991b. Letter from H. Martin Harmless II (IDEM) to Denver Sarver (GE) re: CIL for the Compliance Evaluation Inspection (CEI) performed on January 11, 1991; May 2.

O.H. Materials Corporation (OHM), 1989. Letter from Jeffery A Stevens (OHM) to Jim Brenock (GE) re: USTs sampling results; January 31.

Ruffner, J.A. 1978. "Climates of the States. Volume 1: Alabama - Montana". Gale Research Company, Detroit, Michigan.

U.S. Department of Agriculture, Soil Conservation Service (USDA SCS), 1969. Soil Survey of Allen County, Indiana. U.S. Government Printing Office, Washington, D.C.

U.S. Department of Commerce (USDC), 1968. Climatic Atlas of the United States. U.S. Government Printing Office, Washington, D.C.

U.S. Geological Survey, 1981. Fort Wayne West Quadrangle Map.

ATTACHMENT A
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

General Electric Company - Taylor Street Facility (GE)
Fort Wayne, Indiana
IND 005 448 683

Date:	November 14, 1991
Facility Representatives:	Denver Sarver, Environmental Specialist Deborah Berg, Administrator-Waste Management
Inspection Team:	Scott R. Tajak, Resource Applications, Inc. (RAI) Pete McLaughlin, Resource Applications, Inc. (RAI) Don Stilz, IDEM
Photographer:	Pete McLaughlin, RAI
Weather Conditions:	Calm, Rainy, temperature about 50°F.
Summary of Activities:	The visual site inspection (VSI) began at 9:00 am with an introductory meeting. The inspection team discussed the purpose of the VSI and the agenda for the visit. Facility representatives then discussed GE's past and current operations, solid wastes generated, and release history. Most of the information was exchanged on a question-and-answer basis. GE representatives provided the inspection team with copies of documents requested. The VSI tour began at 11:00 am. Mr. Sarver discussed specific operations conducted at each area as we walked through the production areas. We began the tour in the Wire Mill Department. We inspected the process, as well as the Motor Manufacturing Department Operations nd the Aircraft Systems Control Department Operations. We also inspected hazardous and non-hazardous waste accumulations areas and storage areas, the site of the removal of the USTs and the Enamel House. Photographs of all SWMUs were taken except for one of the UST locations. The tour concluded at 5:30 pm, after which the inspection team held an exit meeting with both GE Representatives. The VSI was completed and the inspection team left the facility at 6:00 pm.

HRE-8J

JUN 3 0 1992

Denver W. Sarver, EHS Specialist
Motor Manufacturing Department
General Electric Company
P.O. Box 2205
2000 Taylor Street
Fort Wayne, Indiana 46801-2205

Re: General Electric Company
IND 005 448 683

Dear Mr. Sarver:

Per your request of June 16, 1992, enclosed please find a copy of the Preliminary Assessment/Visual Site Inspection for the referenced facility.

The executive summary and conclusions and recommendations section have been withheld as enforcement confidential.

If you have any questions, please contact me at (312) 886-4448.

Sincerely yours,

ORIGINAL SIGNED BY
KEVIN M. PIERARD

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

Enclosure

HRE-8J:FHARRIS:6-2884:6/29/92:MASTER.RES/LIST2

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CONCURRENCE REQUESTED FROM REB

OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
	6/29/92	6/30/92	

GE Motors

Motor Manufacturing Department
General Electric Company
P.O. Box 2205, 2000 Taylor Street
Fort Wayne, IN 46801-2205
219 428-2000

June 16, 1992

Mr. Kevin M. Pierard
Chief, OH/MN Technical Enforcement Section
United States Environmental Protection Agency
Region V
230 S. Dearborn St.
Chicago, Ill. 60604

Dear Mr. Pierard:

On November 12, 1991, Mr. Scott Tajak and Peter M. McLaughlin of Resource Applications, Inc. conducted a Visual Site Inspection of the General Electric Facility at 2000 Taylor St. in Fort Wayne, Indiana.

This letter is to request a copy of the Preliminary Assessment/Visual Site Inspection Report. I understand that this copy will not include the conclusions and the Executive Summary portion of the report.

I appreciate your efforts in forwarding the report to me. Should you have any questions or comments, please contact me at (219)428-4005.

Sincerely,

Denver W. Sarver

Denver W. Sarver
EHS Specialist

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: GENERAL ELECTRIC COMPANY

EPA I.D. NUMBER: IND 005 448 683

LOCATION CITY: FORT WAYNE

STATE: INDIANA

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
° Landfill		X
° Surface Impoundment		X
° Land Farm		X
° Waste Pile		X
° Incinerator		X
° Storage Tank (Above Ground)		X
° Storage Tank (Underground)		X
° Container Storage Area		X
° Injection Wells		X
° Wastewater Treatment Units		X
° Transfer Stations		X
° Waste Recycling Operations		X
° Waste Treatment, Detoxification		X
° Other _____		

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

   THERE HAVE BEEN NO RELEASES OF HAZARDOUS WASTE OR HAZARDOUS CONSTITUIENTS FROM ANY WASTE UNIT AT THIS LOCATION.

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

DENVER W. SARVER / RCRA COORDINATOR
Typed Name and Title

Denver W. Sarver
Signature

JANUARY 29, 1986
Date

CONTINUING RELEASES AT PERMITTED FACILITIES

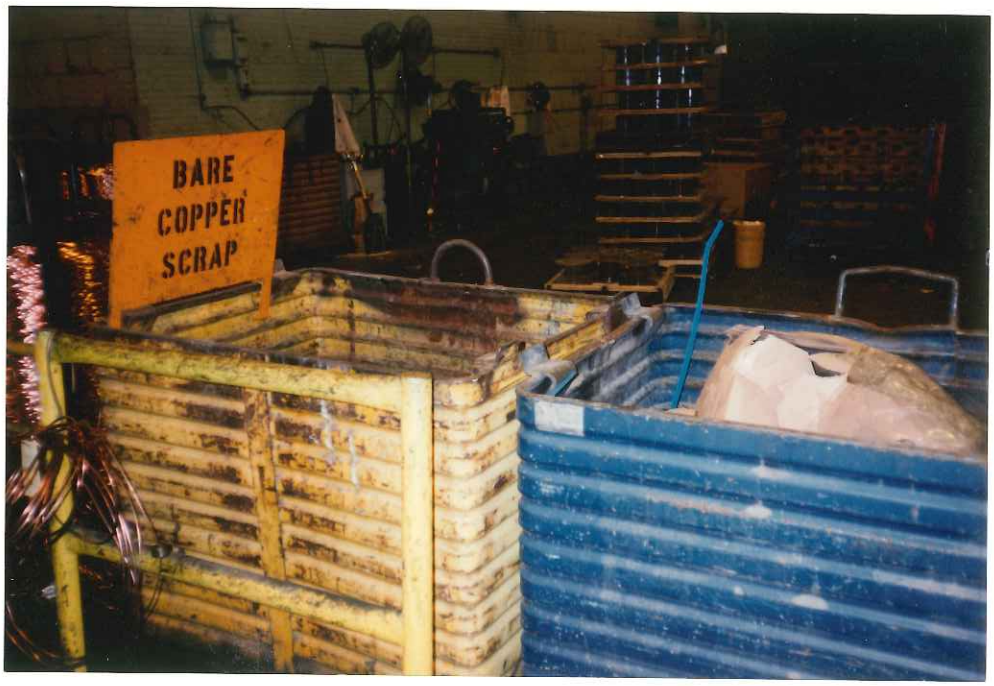
SEC. 206. Section 3004 of the Solid Waste Disposal Act is amended by adding the following new subsection after subsection (t) thereof:

"(u) CONTINUING RELEASES AT PERMITTED FACILITIES.—Standards promulgated under this section shall require, and a permit issued after the date of enactment of the Hazardous and Solid Waste Amendments of 1984 by the Administrator or a State shall require, corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage, or disposal facility seeking a permit under this subtitle, regardless of the time at which waste was placed in such unit. Permits issued under section 3005 shall contain schedules of compliance for such corrective action (where such corrective action cannot be completed prior to issuance of the permit) and assurances of financial responsibility for completing such corrective action.".

Photograph No. 1
Orientation: East
Location: SWMU 1
Date: 11/14/91
Description: Lab Pack wastes in primary plastic bins. These Lab Packs consist of obsolete laboratory materials. This unit is an example of a Hazardous Waste Satellite Accumulation Area.

Photograph No. 2
Orientation: Northwest
Location: SWMU 1
Date: 11/14/91
Description: An example of a primary Hazardous Waste Satellite Accumulation Area. This unit manages enamel coated aluminum and copper scrap/F003 in the Wire Mill.

Photograph No. 3
Orientation: North
Location: SWMU 2
Date: 11/14/91
Description: An example of a Non-hazardous Waste Satellite Accumulation Area. The tray in center manages skimmings from aluminum ingot raw materials.



Photograph No. 4
Orientation: South
Location: SWMU 2
Date: 11/14/91
Description: An example of a Non-hazardous Waste Satellite Accumulation Area. The left bin holds scrap copper and the right bin holds cardboard.

Photograph No. 5 Location: SWMU 3
Orientation: North Date: 11/14/91
Description: Non-Hazardous Waste Storage Tanks. These tanks store used wire drawing compound. Note the concrete wall which serves as secondary containment for the unit.

Photograph No. 6 Location: SWMU 4
Orientation: South Date: 11/14/91
Description: The former location of the Wastewater Treatment Plant. Currently the room contains testing equipment for the Aircraft Systems Control Department.

Photograph No. 7 Location: SWMU 5 and 7
Orientation: South Date: 11/14/91
Description: Location for the Former Hazardous Waste Storage Area. Currently, it is a Non-hazardous Waste Storage Area (SWMU 7). The drums on the pad contain used drawing compound.

Photograph No. 8 Location: SWMU 7
Orientation: Northeast Date: 11/14/91
Description: A view of a portion of the Non-hazardous Waste Storage Area. Each binned area has various metallic scrap waste.

Photograph No. 9 Location: SWMU 7
Orientation: Southeast Date: 11/14/91
Description: A view of a portion of the Non-hazardous Waste Storage Area. Each binned area has various metallic scrap waste.

Photograph No. 10 Location: SWMU 8
Orientation: West Date: 11/14/91
Description: Condensation from drip lagoon next to Oil House. Condensation from wire mill process is pumped here for storage while sampling is performed.

Photograph No. 11 Location: SWMU 7
Orientation: Northeast Date: 11/14/91
Description: The Hazardous Waste Storage Area #2. All waste is sealed and stacked on two or three-tier steel racks. All hazardous waste except some TCA-contaminated solids are stored here for less than 90-days. GE does not store any hazardous waste for greater than 90 days.

Photograph No. 12 Location: SWMU 9
Orientation: North Date: 11/14/91
Description: A portion of the Non-hazardous Flyash Waste Storage Area for wet and dry flyash.

Photograph No. 13 Location: SWMU 11
Orientation: North Date: 11/14/91
Description: A 30-gallon polypropylene barrel used for storing TCA-contaminated material. To the right of this container not shown in picture is a dumpster for all TCA-contaminated solid waste.

Photograph No. 14 Location: AOC 1
Orientation: East Date: 11/14/91
Description: Location of the removal of four commercial product USTs. One was found to have contaminated the soil. Note the tank closed in place to the far right of the photo.

Photograph No. 15
Orientation: South
Description: Open Asbestos insulation in Enamel Room.

Location: AOC 2
Date: 11/14/91

Photograph No. 16
Orientation: North
Description: Enamel filter units in Enamel Room. Note spillage of enamels and unknown substances under all units.

Location: AOC 2
Date: 11/14/91

Photograph No. 17
Orientation: West
Description: Enamel Room. Note unknown release on floor.

Location: AOC 2
Date: 11/14/91

Photograph No. 18
Orientation: East
Description: Enamel Room. Note enamel release on floor.

Location: AOC 2
Date: 11/14/91

Photograph No. 19 Location: AOC 2
Orientation: North Date: 11/14/91
Description: Enamel Room. Note enamel seepage of ground water in center of photograph. Also note unknown release on floor.

Photograph No. 20 Location: AOC 3
Orientation: East Date: 11/14/91
Description: Diesel Fuel Release Area. Note that a pit lies to the left of this AOC. This pit, AOC 1, is the former location of a commercial product tank that was found to have contaminated the soil.

ATTACHMENT B
VISUAL SITE INSPECTION FIELD NOTES

EMPLOYEES:
Continuous (7) Wire mill = 240
3 Shifts (5) Motor = 420
3 Shifts (5) Aircraft = 1000

NW = Business / Commercial
N = Sweeny Park
S = Residential
E = Essex
W = Slater Steel (Stainless Steel)

Wire Mill
magnet wire drawing and enameling operation
Copper rod } draw that to various sizes
Aluminum }
apply an insulating coating

Waste wire enamels
methelyne chloride / formic acid mixture
mineral spirits / Petroleum naptha
liquid caustic stripper
methyl pyrolidine
solids contaminated with above
Scrap copper and aluminum
wire drawing compounds

Scott R. Agate (SRT) 11/14/91 ①

GE TAYLOR ST

1990 STATS - for all 3 divisions combined

drawing compound - 210,000 gallons

waste wire enamels - 5,500 gallons

solids contaminated w/wire enamels - 5,800 gallons

filter/drawing compounds - 7,330 gallons

caustic stripper - 1,000 gallons

methylene chloride - 330 gallons (log (1990))

petroleum naptha - 500 gallons

scap copper/aluminum -

methyl ~~pyrrydiniat~~ pyrrolidine - 200 gallons

Drawing - lubricant from drawing the rod

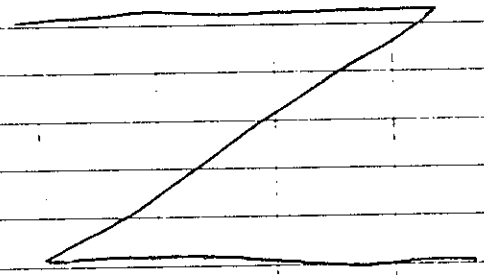
enamels - waste of coating of wire

Caustic stripper - Cleaning of machinery strip enamel off machinery cleaning

naptha - Cleaning of parts as above

methyl pyrrolidine - Cleaning of parts

solids/with enamels - cups sampling goes into sampling waste debris cardboard



SRT 11/14/91 (2)

GE TAYLOR ST.

Motor Manufacturing

manufacturing of fractional to integral electric = alternating current electric motors.

1/4 horsepower to 5 horspower

Process = aluminum die casting
= steel processing/punchwork
= welding
= annealing
= painting/varnish
= machining
= assembly
= packaging

1990 Estimated Totals

Waste generated

mineral spicits = 3,300 gal ← same as previous

liquid caustic stream = 220 gal

boiling varnish = 2,500 gal

a) water soluble - type

b) organic type ← 200 gal mixed w/paints + varnish

grinding sludge = 13,000 gal

paints and thinners = 3,600 gal

paint sludge = 1,700 gal

waste oils = 1,200 gal

waste coolants = 13,000 gal

Aluminum/Steel/Copper

steel shot waste 330 gal

sweeping/oil dry 3,000 gal

SRT 11/14/91 (3)

GE TAYLOR ST

aluminum dies cast
manufacture of Al parts that go into manufacture
↳ aluminum scrap
oil/dry waste
lubricating of dies, shot equipment, machinery waste
hydraulic oil
Steel pressing / punch
all punchwork pressing of all parts of motor
↳ different types of steel scrap
waste oil stream – minor
Welding shell and stator together – no waste
annealing – lamination of motors/stators
electric properties
heat treating
air – exemption – why?
painting – shells of motor
– powder paint
waste powder (new process – late summer) (sitting on waste)
– wet spray
waste paint
paint sludge
– air permit needed

no wastes

SRT 11/14/91 (4)

GE TAYLOR ST

Varnish – water soluble varnish – stator
waste varnish – cleaning of tank
special hand clip operation
Very limited
stator hand wiring etc together

machining – steel shafts – carbon steel shaving – stainless – sizable chips
aluminum end shield
rotor shells – steel chips
aluminum shaving

waste oils/lubricating/coolants
assembly – no waste
packaging – cardboard/plastic
plastic trash
waste reduction

aircraft
electronic control operation
assembly – circuit boards
soldering
lab packs or trash
mounting boards in an enclosure
potting – (circuit boards mounted in a plastic/solder substance)
1. 111, trichloroethane ALPHA SAS – (TCA) 7,000 gal
2. Genesolv DTA – 100 gal

SRT 11/14/91 (5)

GE TAYLOR ST

3. Towels/Papers - with TCA 3,000 gal
4. Lab Packs -
   outdated materials
   liquid/solids
   unmanageable
   } 3,500 gal as packed
5. Solder - 2 55-gallon drums per year to a Precious Metal reclaims til October, 1991 now considered a hazardous waste.

PCB - power distribution system
4 year program
removal of a lot of suspected Chlorinated pollutants

GE had a Zinc plating operation that stopped in 1985.
Chrome rinses
Zinc phosphate rinses

1942 GE contractor built a war production plant turbo Chargers for aircraft
1945 - owned facility produce motors
1949-51 - Wire mill
1981 motor section closed / aircraft moved in

SRT 11/14/91 (6)

GE TAYLOR ST

Prior to 1976 - landfill - general practices
1976 - began to handle suspected hazardous waste on manifested system to appropriate
Currently they certify and inspect landfills before disposal at this site
Water - soluble varnish mid-late 1970s buried at NW - purchased in 1960's

Power House
- Coal fired
- generates ash
- hauled to landfill

Maintenance Shop (?)
↳ Steam cleaning pad
waste oil
waste batteries small generation
Sold
- they question reclaimers
- cradle to grave

Permits
3 NPDES - expired June 30, 1990
January 30, 1990 resubmit
001, 002, 003 > storm drainage
IN0000973

St. Mary's River - parking lot yard
also previous to mid 1970's
non-contact cooling waters

SRT 11/14/91 (7)

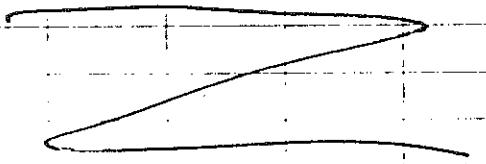
GE TAR

Part of powerhouse cooling tower
Sludge last removal 1979

Sanitary District Permits
IFT 03086 - Wire mill operation
process and sanitary flows subject
to aluminum/copper pretreatment
standards CFR 467-468

Being Changed by 2/92
new connection
no process discharge
closed recirculation system for waste water

IFT 03087
Serves rest of facility
motor/aircraft
↙ ↘
process/sanitary | no process connection
↳ metal treatment | just sanitary
Categoric pretreatment
CFR 433 regs



SRT 11/14/91 (8)

GE TAR

Air Permits - paint spray booth
varnish dip tank
3 power house - 1 for each
air permits boiler
4/1/90 expired
8 Magnet #1

Closure - Hazard waste storage pad
1976 - 1985
closed

13 UST removal + remediation (all product)
1986-87
to remove all USTs / properly closed in
place. 1 was closed in place.
1 was a leaker in oil house area
↳ product - organic hydrocarbon
all waste storage is in 55-gallon drums

Releases
coolant NPDES Outfall - 002 outfall
spilled wire drawing compound
entered into discharge sand
clogged pipes that evening
material was removed
1985 Zinc
Chromatic /
pretreatment plant closed 1985
operation permit exemption
discharge to sanitary sewer system
Varnish
Dust racks = Varnish

SRT 11/14/91 (9)

GE TAYLOR ST

Sheaves
Caustic
formic acid
pyrrolidine
polyester
nylon

① petroleum naptha - parts cleaner tank
Safety-Kleen comes in and takes it
methyl Chloride / pyrrolidine 55-gal drum
mineral spirits

mineral spirits NW

② Pumped from tank to drum
methylene Chloride - 150-gal
2 rinse tanks one to left one to right
sleaves for wire put in baskets
or on pale dipped
2 hour wait before removal it is
lifted allowed to dip and put
into & repose tub (48) round pulleys

③ drawing wire is pulled through lubricants
are cleaned below ground level and are
piped via pressure to 2 - 7,000-gallon
storage tanks

11/14/91
SRST (10)

GE TAYLOR ST

Secondary containment = 1 ft thick
5½ ft wall
fiberglass liner or float.

④ Battery disposal
cleaning / maintenance
Charging station
containment if they spill over
once every 3 months it is emptied
(pan)
4 ft x 6 ft
1 ft high steel tub

methylene = Satellite
filled drum
empty unit drum to HWSA

⑤ 3yd³ hard scrap, copper wire tub / cardboard tub

⑥ 3yd³ oily = floor sweeping
reduction per die 96% of original
Each drawing system has tanks below
with filters system
paper filters - disposed of in 55-gal drum
Petro Chem or OHM
waste disposal take care of filter
paper goes into solid fuel blending

⑦ Filter paper machines
cracks solid waste
oil at base

⑧ Solid Copper drawing fluid tank
soap / shaving / oils settling in picture
into 55-gal non-hazardous drums

11/14/91 (11)

GE TAYLOR ST

(9) all stuff on floor drained into pipes that lead to tank SWMU 1 or 2
Cream 2 of these
Microseparator
Cream Separator
aluminum system - new version of filter system

(10) waste in 55-gallon drum plastic lined for aluminum wire drawing system

(11) Hydraulic oil - leaking
spooler unit
due to pressure impossible to stop leaks.

(12) Copper / aluminum
afterburner
reburush frame
and then set off as exhaust

Lubex - wax
applied to wire
lubrication for wire winding

Central satellite enamel waste area
enamels - solids & liquid

(13) wood block floor
in some areas replaced with concrete
next to this is raw material 11/14/91

SRT (12)

GE TAYLOR ST

(14) product release on floor
pan full with some corrosive material.
Alpha
NIMP
Corrosive liquid poisonous
UN 2920
Peg Hamel Cleaner

(15) stacks from ovens

(16) Powerhouse / boilerhouse stacks.

(17) Filters - enamel - 8
8000 gallons

(18) transfer station enamel
ground leakage
pumped into lagoon for sampling
floor cracking.

(19) enamel room
concrete
leakage - concrete floor brick
too many links
Wooden floor

(20) dripping on floor

(21) asbestos

SRT 11/14/91 (13)

GE TAYLOR ST

(21) B. Enamel dunking trough
went to enamel transfer station
PVC Bin sump/pipe and into system

(22) concrete/lagoon 10 x 25 x 4 ft
C Kim Kline - wire mill

(23) aluminum diecasting floor sweeping -
aluminum shaving/oil
oil - when cleaning unit

(24) skimming - from melt pot sold to
aluminum reprocessor | crud/dirt
mixed can't use in product
aluminum brought in ingots

(25) all endshields go through shot
blast steel shot
shot blast dust collector

(26) Machining of parts separates
coolant and aluminum chips out
GE machine cast iron but does no
casting themselves
3-4% of what they handle
Shaft area
shaft - hybrid
- stainless steel

(27) grinding swarf filter in drums
filtering unit no secondary containment
plus 3 55-gallon drums 11/14/91
≈ 1,000 gal
splash/foam spillover oily

SPA (14)

GE TAYLOR ST

powder paint
unit baked in ovens
in for TCLP sampling
MSDS says nothing toxic
all waste is baked and
placed in pit house

(28) Potential storm
Currently varnish raw material
sometimes contain spent varnish
on conveyor
plastic liner 2 inches deep
over concrete
8 in concrete slab
wood block or 4 in bonded concrete
on top of that
facility

(29) hand dip tank
dipped by hand
put on cart
cart put in oven
air compressor
power tools
furnace motors
small farm equipment
air control motor
ignitable
has xylene thinner
dries out as
pool with paints

(30) grease product
insert into new motors
oil on floor
on runners

SPA 11/14/91 (15)

GE TAYLOR ST

(31) Paint - Spray Booth
Color
Paint booth touch up spray pans

sludge/paint - empty
air permit
goes through centrifugal
paint recycled
sludge put in 55-gal drum on
wheeled round pallet

(32) bleach drum
solvent
white drum - cleaning from spray guns

(33) rinse water
A. parts washer iron phosphate
stamping parts
goes into waste water treatment
system.
assemble bus
capacitors

Hybrid circuitry
microelectronics
microscopes to do work
gold
clean room atmosphere

SBT 11/14/91

GE TAYLOR ST

(33) B. TCA rags/papers
C. ALPHA 565
janitors pick it up and bring it here
in loading dock and placed
30 gal poly urethane
solid fuel blending
Petro Chem in Detroit
CHM in Georgia
it is shredded and used as
fuel blending material

(34) Alpha 565
7 degreasers

(35) empty drums
at end of process
new solvent to B degreaser -
150 gal tank on the mezzanine
to 150 gal tank (holding)
back to original drums as waste.

(36) This area has old fillers paint
and various components
if maintenance can use it then
they take it. Otherwise it is
considered to be lab pack waste
of various products
This area is locked.

(37) Waste ALPHA 5765 (TCA)
ISOPROPYNOL
Waste Flux

SBT 11/14/91

waste ~~paper~~ rags / paper etc
3 containers
5 gallon tubs > labels
1 small garbage can
lead - was undetectable in exhaust fumes
permit applied for Air permit
section has been out and think GE
may be exempt due to low toxicity
freon / methylene chloride
degreasor from Hybrid Micro~~electr~~
electronics

(38) Waste Genesolv DMS > Satellite Accum.
Waste Genesolv DTA > Area
un/1977

(39) TCA gravity fed — put in sink pumped
fillup station — back to original tank
retrieve what they
need. They use 5-gallon
flux container and carried
to their unit.

(40) This TCA is brought here
Satellite Accumulation
December sink will be removed

(41) Minidegreasor TCA
pumped back to original tank
with metering system with waste 11/14/91
minimization

SRT

(42) Solder dross Satellite area
end of day work stations
waste oil in area.

(43) Isopropyl alcohol - Satellite Accum.
in 5-gallon
1-gallon cans

(44) Drag Solder
Solder dross
board goes across heating well
flux sprayed on board
helps soldering then dipped in flux
sits for a period of time.
this area sits in a C-flow section
board is dragged over solder

(45) Sodium hydrochloride former
Zinc plating operation
Concrete
1974-85 PRETREATMENT
Structionally Strong
liner -
Rubber T liner with
concrete poured on to it
seams were welded

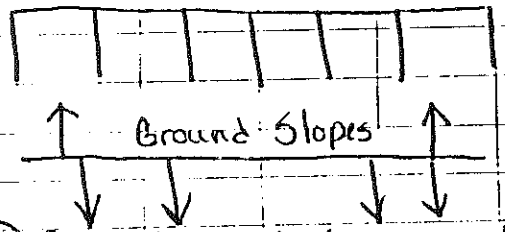
SRT 11/14/91

GE TAYLOR ST

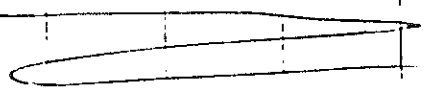
(46) plating facility location

(47) non-hazardous storage area
floor sweeping
aluminum flush
formerly (orient south) old hazardous
storage pad.

(48) North
6 bins
aluminum wire
old defective motor
scrap aluminum scrap
empty boxes ≤ repair
tote boxes - defective
Cracked cement
wall 4 1/2 - 5 ft



(49) General Steel Scrap old machinery / scrap
Shredding | scrap
4 1/2 - 5 1/2 ft
Cement flooring Cracked



SRT 11/14/91 (20)

GE TAYLOR ST

(50) East - North East
drum - recyclable
sent back to vendor 30 yd³ dumpster
formerly product

(51) UST removal area
1 in place
cant removed
under foundation of oil house
pit contains H₂O in banks contain
gravel / dirt - fill material

(52) above ground gas pump
diesal fuel product

(53) oil house
all flammables
oils
TCAs
Ventilated area
Bricks for powder paint - waste powder

(54) oil house
wire enamels
paints
xylene
mineral spirits
flux
all product
all electrical / explosion proof

(55) Hazardous and industrial waste
waste paint thinner
alpha 5165 TCA

SRT 11/14/91 (21)

GE TAYLOR ST

Genesolv DTA
clear bonding varnish
aluminum sludge
aluminum sludge filler
copper sludge
methylene chloride
caustic soda
oils/coolants
wire enamel - open top
used sulfuric acid
new waste stream - die lab
test enamel wire
takes enamel off wire -
2 - 20 gal polyurethane tubs
Heritage Environmental Services
previously junk storage - originally
propane loading area
foundation 4-inch berm South
poured as single unit
2 ft on north side
10% of a full contained
ramp at door.

(56) Fly ash Accumulation Area

(57) Fly ash Storage Area
stream goes to Essex → RAI #1
plant next door
and GE on Broadway
11/14/91

GE TAYLOR ST

(58) Fly ash - former flyash storage area vacuum sucked out by truck

(59) NPDES 001
meter house
each one is checked
and a sample is taken
if flow is determined

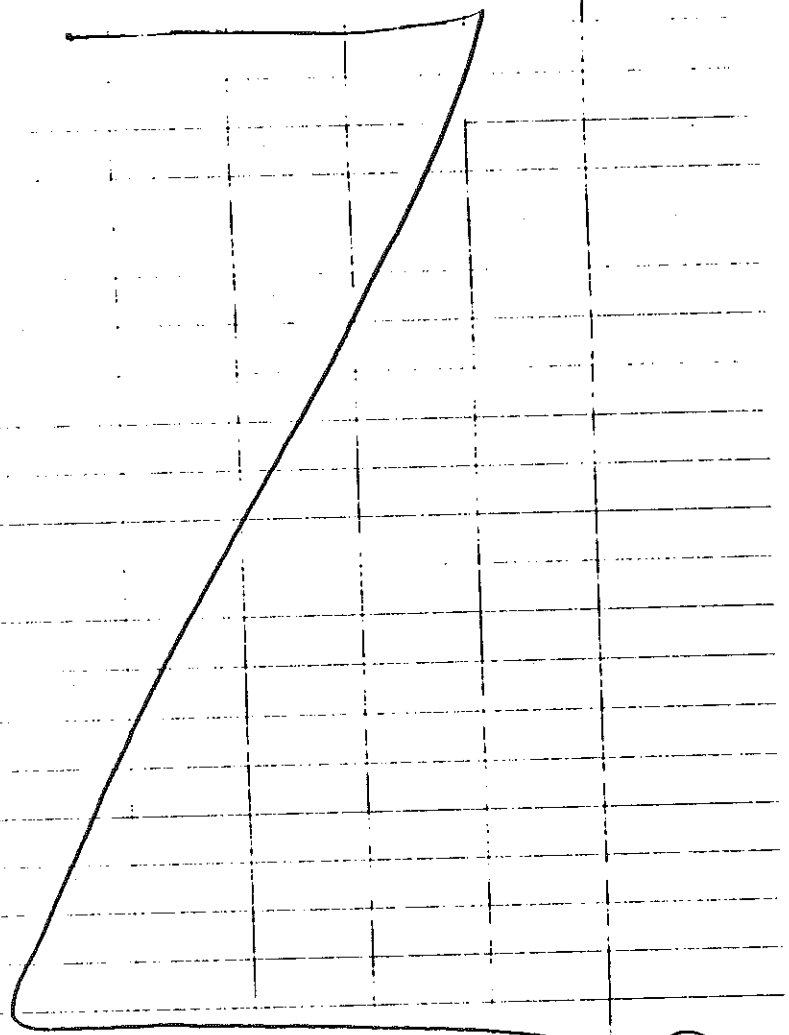
(60) pressure open lid
also near here intersection
of both sanitary district
sewer lines

(61) NPDES 002
pressure regulated
sand bags from release previously observed
water observed

(62) NPDES 003
water flow present
grit chambers sludge - flyash
same material different form

(63) Cooling Towers
1992 enclosed in
wooden tower originally
165,000 gallon
100,000 in sumps
65,000 in piping system
11/14/91

GE TAYLOR ST
noncontact cooling -
air conditioning - primarily



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11/14/91

ATTACHMENT C

SAMPLING RESULTS FROM UNDERGROUND STORAGE TANK REMOVAL

O.H. Materials Corp.
16406 U.S. Route 224 East
P.O. Box 551
Findlay, Ohio 45839-0551
419-423-3526
Telex 298248 OHMI UR (RCA)

OHM

January 31, 1989

Mr. Jim Brenock
Manager, Plant Engineering
General Electric Company
2000 Taylor Street
P.O. Box 2205
Fort Wayne, IN 46801-2205

Dear Mr. Brenock:

From July 13, through August 19, 1988, OHM removed 12 underground tanks, one oil/water separator, and conducted "In Place Disposal" of one tank at the General Electric, Taylor Street Facility in Fort Wayne, Indiana. There were five excavations. After the tanks and backfill were removed, the excavations were inspected visually and with a photoionization detector (PID). The PID reading locations for the excavations are shown on the attached sketches. All the excavations except one were backfilled to grade with clean backfill. The remaining excavation was left open pending further investigation by General Electric.

Tank No. 12 was located partially underneath a structure which may have been damaged if the tank was removed. The methods used for "In Place Disposal" were those specified in the American Petroleum Institute Recommended Practice 1604, Section 3. In addition to these methods, the tank was high pressure washed and a wipe sample was taken. The analytical report for the wipe sample is attached. The tank was then filled with a sand/cement mix.

Should you have any questions, please contact me at 419-423-3526.

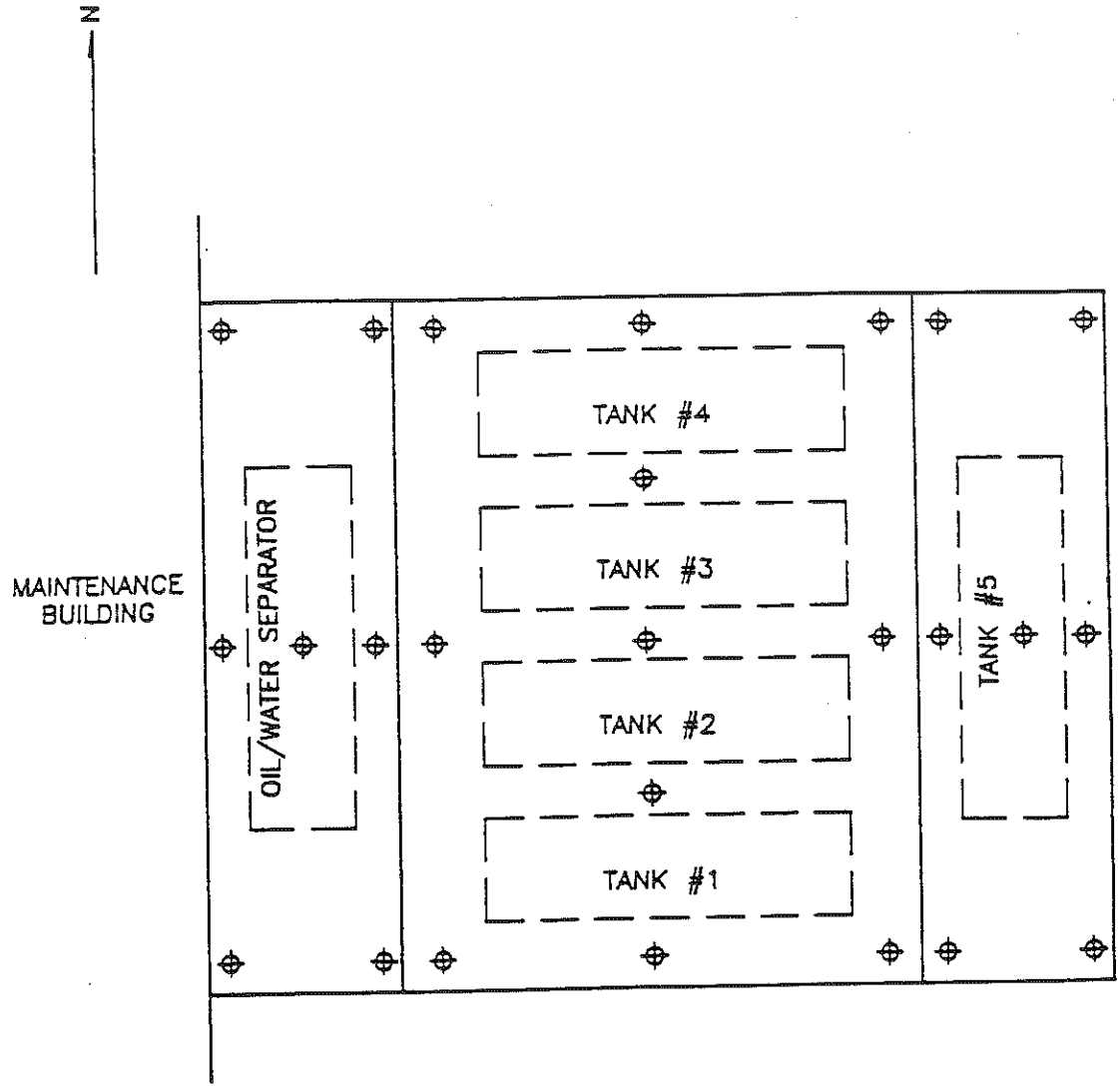
Sincerely,

Jeffery A. Stevens
Project Manager

JAS:acs

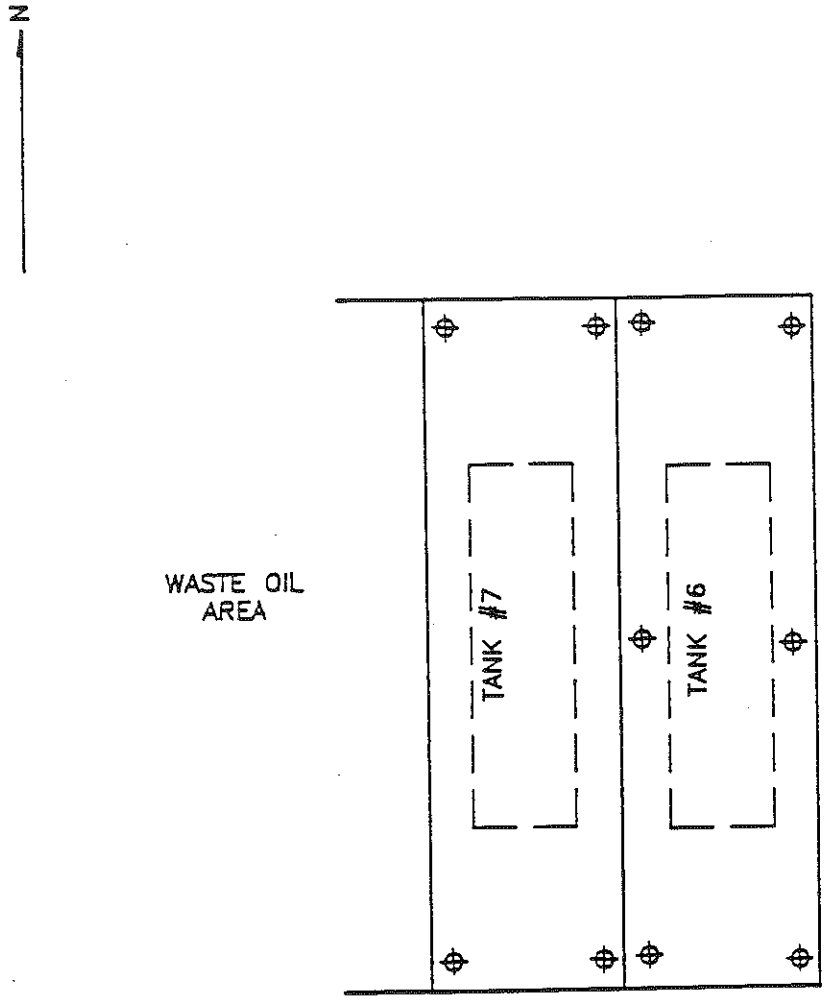
Attachments

pc: Mr. Tom Corneil, General Electric
Project File No. 6210



NOTE: ALL READINGS WERE AT 0 – 5ppm LEVEL

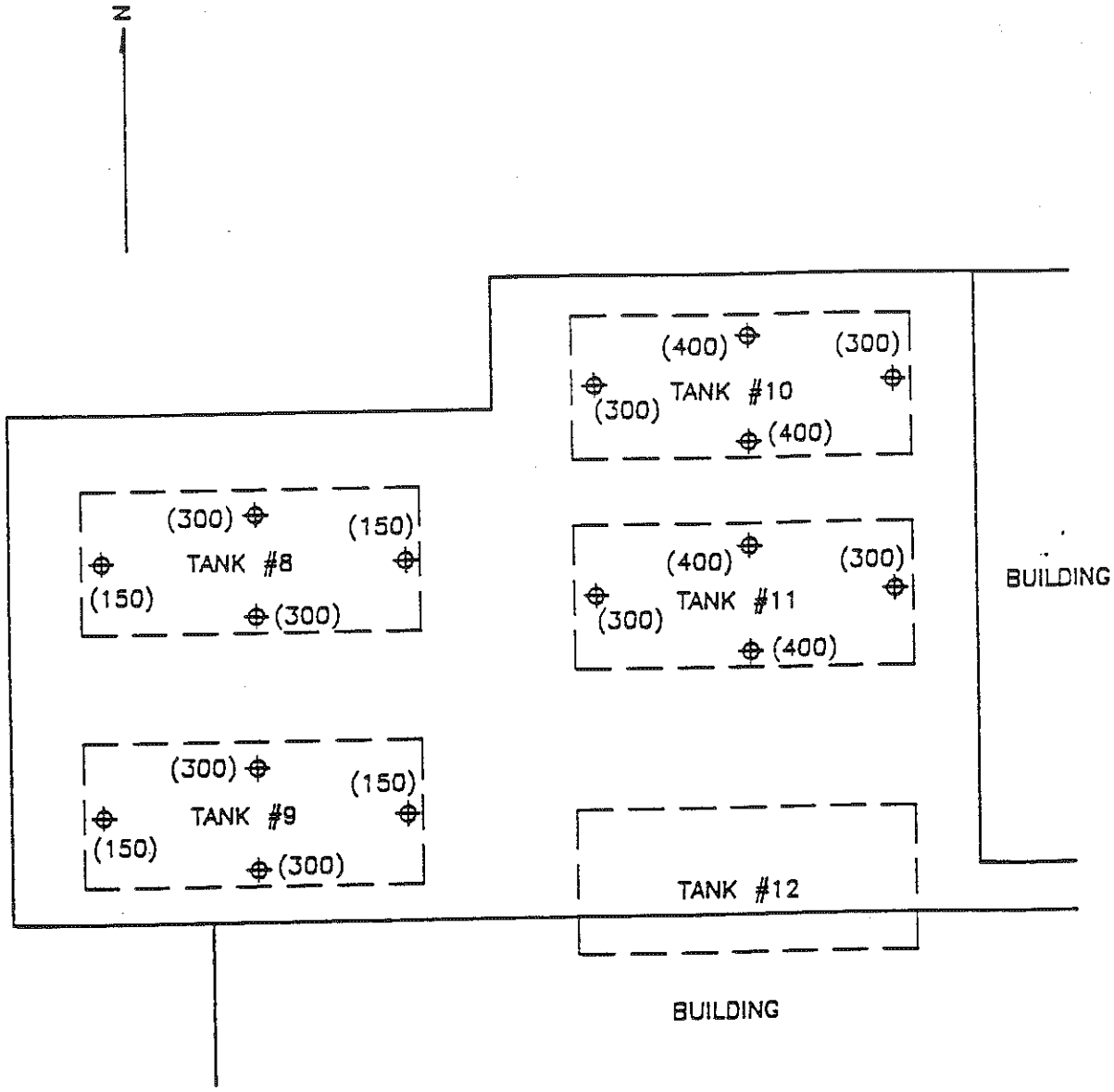
PID READINGS AT EXCAVATION
AROUND TANKS #1–#5
AND OIL/WATER SEPARATOR
GENERAL ELECTRIC
TAYLOR STREET FACILITY
FORT WAYNE, INDIANA



⊕ PID READING LOCATIONS

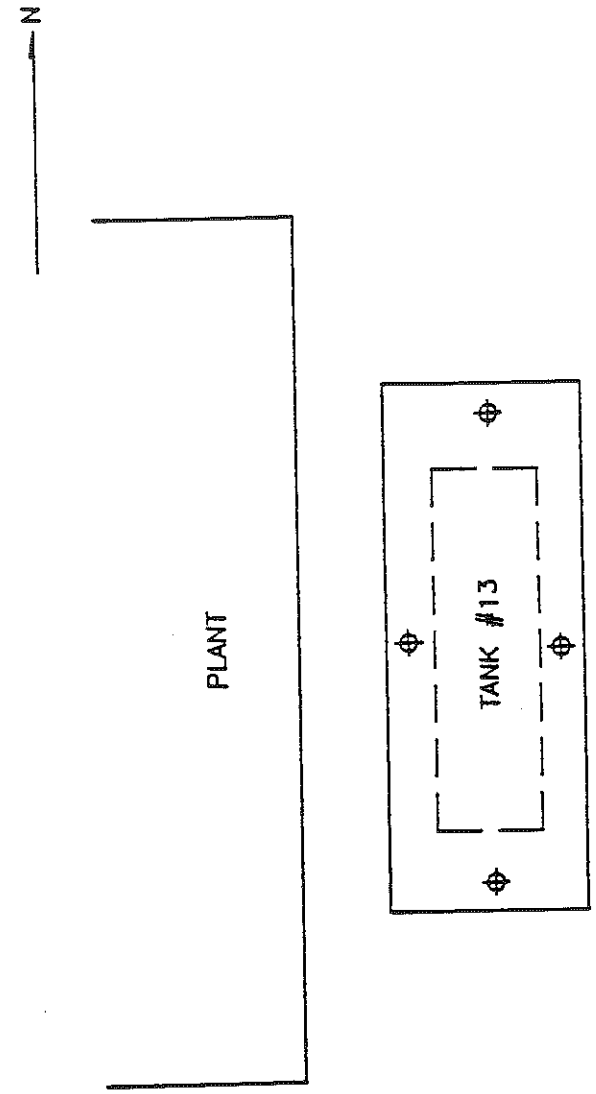
NOTE: ALL READINGS WERE AT 0 – 5ppm LEVEL

PID READINGS AT EXCAVATION
AROUND TANKS #6–#7
GENERAL ELECTRIC
TAYLOR STREET FACILITY
FORT WAYNE, INDIANA



⊕ PID READING LOCATIONS (ppm)

PID READINGS AT EXCAVATION
AROUND TANKS #8–#11
GENERAL ELECTRIC
TAYLOR STREET FACILITY
FORT WAYNE, INDIANA



⊕ PID READING LOCATIONS

NOTE: ALL READINGS WERE AT 0 – 5ppm LEVEL

PID READINGS AT EXCAVATION
AROUND TANK #13
GENERAL ELECTRIC
TAYLOR STREET FACILITY
FORT WAYNE, INDIANA

ANALYTICAL REPORT

Findlay Laboratory, A Division of
Environmental Testing and Certification Corp.
16406 U.S. Route 224 East
P.O. Box 1404
Findlay, Ohio 45839-1404

ETC - FINDLAY LABORATORY

CLIENT: General Electric
Ft. Wayne, IN

ATTN: J. Stevens

PROJECT NUMBER: 6210

SAMPLE TYPE: Wipe

ANALYSIS PERFORMED:

TPHC

(Samples: 004 - 006)

DATE COMPLETED: 8/29/88

DATE RECEIVED: 8/27/88

The analyses and data interpretation that form the basis of this report was prepared under the direct supervision and control of the undersigned who is solely responsible for the contents and conclusions therein.

Reviewed and
Approved by: R. J. Schock, Mgr.-ETC Findlay Laboratory — Date 8/30/88

PROJECT 6210

SUMMARY REPORT OF ANALYTICAL SERVICES

1. INTRODUCTION

Environmental Testing & Certification Corp. (ETC) Findlay Laboratory received samples from O.H. Materials Corp. These samples were acquired by their technical personnel and transferred to the laboratory complete with a chain-of-custody record, a copy of which is attached for reference. These samples were analyzed for the following:

TOTAL PETROLEUM HYDROCARBONS BY IR

Samples were prepared according to SW-846 Method 9071; cleaned up using silica gel and analyzed according to EPA Method 418.1, Petroleum Hydrocarbons, Total, Recoverable, Spectrophotometric, Infrared.

2. ANALYTICAL RESULTS

The following table details the analytical results for samples #6210-004 through #6210-006.

TABLE 1 - TOTAL PETROLEUM HYDROCARBONS BY IR

Sample Number	Description	Concentration (ug/100 cm^2)
6210-004	Wipe; Tank #12	BDL
6210-005	Wipe; Tank #9	0.57
6210-006	Wipe; Tank #10	BDL

Limit of Detection = 0.5 ug/100 cm^2
BDL = Below Detection Limit

OHM

CHAIN-OF-CUSTODY RECORD

Form 0019
Field Technical Services
Rev. 03/88

No. 42359

O.H. MATERIALS CORP. • P.O. BOX 551 • FINDLAY, OH 45839-0551 • 419-423-3526

PROJECT NAME: GE
PROJECT LOCATION: Ft. WAYNE IN
PROJ. NO.: 6210
PROJECT CONTACT: MIKE GEISER
PROJECT TELEPHONE NO.:
CLIENT'S REPRESENTATIVE:
PROJECT MANAGER/SUPERVISOR: JEFF STEVENS

ITEM NO.	SAMPLE NUMBER	DATE	TIME	COMP	GRAB	SAMPLE DESCRIPTION (INCLUDE MATRIX AND POINT OF SAMPLE)	NUMBER OF CONTAINERS	ANALYSIS DESIRED (INDICATE SEPARATE CONTAINERS) TPHC	REMARKS
1	6210-004	8/25	1445			TANK # 12 100 cm² WIPE	1-8oz jar	✓	
2	6210-005	8/25	1500			TANK # 9 100 cm² WIPE	1-8oz jar	✓	
3	6210-006	8/25	1520			TANK # 10 100 cm² WIPE	1-8oz jar	✓	
4									
5									
6									
7									
8									
9									
10									

TRANSFER NUMBER	ITEM NUMBER	TRANSFERS RELINQUISHED BY	TRANSFERS ACCEPTED BY	DATE	TIME
1	1-3	Chris Beer	Lab Cooler		
2	1-3	Lab Cooler	C Degin ETC	8-27-91	0730

REMARKS: Quick turnaround

Chris Beer
SAMPLER'S SIGNATURE

Notification for Underground Storage Tanks

FORM APPROVED OMB NO. 2050-0044 APPROVAL EXPIRES: [illegible]

FOR TANKS IN **IN**

RETURN COMPLETED FORM TO: Division of Land Pollution Control
UST Program
Indiana State Board of Health
P.O. Box 7015
Indianapolis, IN 46207
(317) 243-5060

STATE USE ONLY
I.D. Number
Date Received

GENERAL INFORMATION

Notification is required by Federal law for all underground tanks that have been used to store regulated substances since January 1, 1974, that are in the ground as of May 8, 1986, or that are brought into use after May 8, 1986. The information requested is required by Section 9002 of the Resource Conservation and Recovery Act, (RCRA), as amended.

The primary purpose of this notification program is to locate and evaluate underground tanks that store or have stored petroleum or hazardous substances. It is expected that the information you provide will be based on reasonably available records, or, in the absence of such records, your knowledge, belief, or recollection.

Who Must Notify? Section 9002 of RCRA, as amended, requires that, unless exempted, owners of underground tanks that store regulated substances must notify designated State or local agencies of the existence of their tanks. Owner means—
(a) in the case of an underground storage tank in use on November 8, 1984, or brought into use after that date, any person who owns an underground storage tank used for the storage, use, or dispensing of regulated substances, and
(b) in the case of any underground storage tank in use before November 8, 1984, but no longer in use on that date, any person who owned such tank immediately before the discontinuation of its use.

What Tanks Are Included? Underground storage tank is defined as any one or combination of tanks that (1) is used to contain an accumulation of "regulated substances," and (2) whose volume (including connected underground piping) is 10% or more beneath the ground. Some examples are underground tanks storing: 1. gasoline, used oil, or diesel fuel, and 2. industrial solvents, pesticides, herbicides or fumigants.

What Tanks Are Excluded? Tanks removed from the ground are not subject to notification. Other tanks excluded from notification are:
1. farm or residential tanks of 1,100 gallons or less capacity used for storing motor fuel for noncommercial purposes;
2. tanks used for storing heating oil for consumptive use on the premises where stored;
3. septic tanks;
4. pipeline facilities (including gathering lines) regulated under the Natural Gas Pipeline Safety Act of 1968, or the Hazardous Liquid Pipeline Safety Act of 1979, or which is an intrastate pipeline facility regulated under State laws;
5. surface impoundments, pits, ponds, or lagoons;
6. storm water or waste water collection systems;
7. flow-through process tanks;
8. liquid traps or associated gathering lines directly related to oil or gas production and gathering operations;
9. storage tanks situated in an underground area (such as a basement, cellar, mineworking, drift, shaft, or tunnel) if the storage tank is situated upon or above the surface of the floor.

What Substances Are Covered? The notification requirements apply to underground storage tanks that contain regulated substances. This includes any substance defined as hazardous in section 101 (14) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), with the exception of those substances regulated as hazardous waste under Subtitle C of RCRA. It also includes petroleum, e.g., crude oil or any fraction thereof which is liquid at standard conditions of temperature and pressure (60 degrees Fahrenheit and 14.7 pounds per square inch absolute).

Where To Notify? Completed notification forms should be sent to the address given at the top of this page.

When To Notify? 1. Owners of underground storage tanks in use or that have been taken out of operation after January 1, 1974, but still in the ground, must notify by May 8, 1986. 2. Owners who bring underground storage tanks into use after May 8, 1986, must notify within 30 days of bringing the tanks into use.

Penalties: Any owner who knowingly fails to notify or submits false information shall be subject to a civil penalty not to exceed $10,000 for each tank for which notification is not given or for which false information is submitted.

INSTRUCTIONS

Please type or print in ink all items except "signature" in Section V. **This form must by completed for each location containing underground storage tanks.** If more than 5 tanks are owned at this location, photocopy the reverse side, and staple continuation sheets to this form.

Indicate number of continuation sheets attached: 2

I. OWNERSHIP OF TANK(S)

Owner Name (Corporation, Individual, Public Agency, or Other Entity)
General Electric Company

Street Address
2000 Taylor St. PO Box 2205

County
Allen

City: Fort Wayne | State: Indiana | ZIP Code: 46801-2205

Area Code: (219) | Phone Number: 428-4786

Type of Owner (*Mark all that apply* ☒)
- [X] Current
- [ ] Former
- [ ] State or Local Gov't
- [ ] Federal Gov't (GSA facility I.D. no. _____)
- [X] Private or Corporate
- [ ] Ownership uncertain

II. LOCATION OF TANK(S)

(If same as Section 1, mark box here [X])

Facility Name or Company Site Identifier, as applicable
General Electric Company

Street Address or State Road, as applicable
2000 Taylor Street

County
Allen

City (nearest): Fort Wayne | State: Indiana | ZIP Code: 46804

Indicate number of tanks at this location: 13

Mark box here if tank(s) are located on land within an Indian reservation or on other Indian trust lands: [ ]

III. CONTACT PERSON AT TANK LOCATION

Name (If same as Section I, mark box here [ ]): Denver W. Sarver
Job Title: Engineering Specialist
Area Code: (219) | Phone Number: 428-4786

IV. TYPE OF NOTIFICATION

[ ] Mark box here only if this is an amended or subsequent notification for this location.

V. CERTIFICATION (Read and sign after completing Section VI.)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

VI. DESCRIPTION OF UNDERGROUND STORAGE TANKS (Complete for each tank at this location)

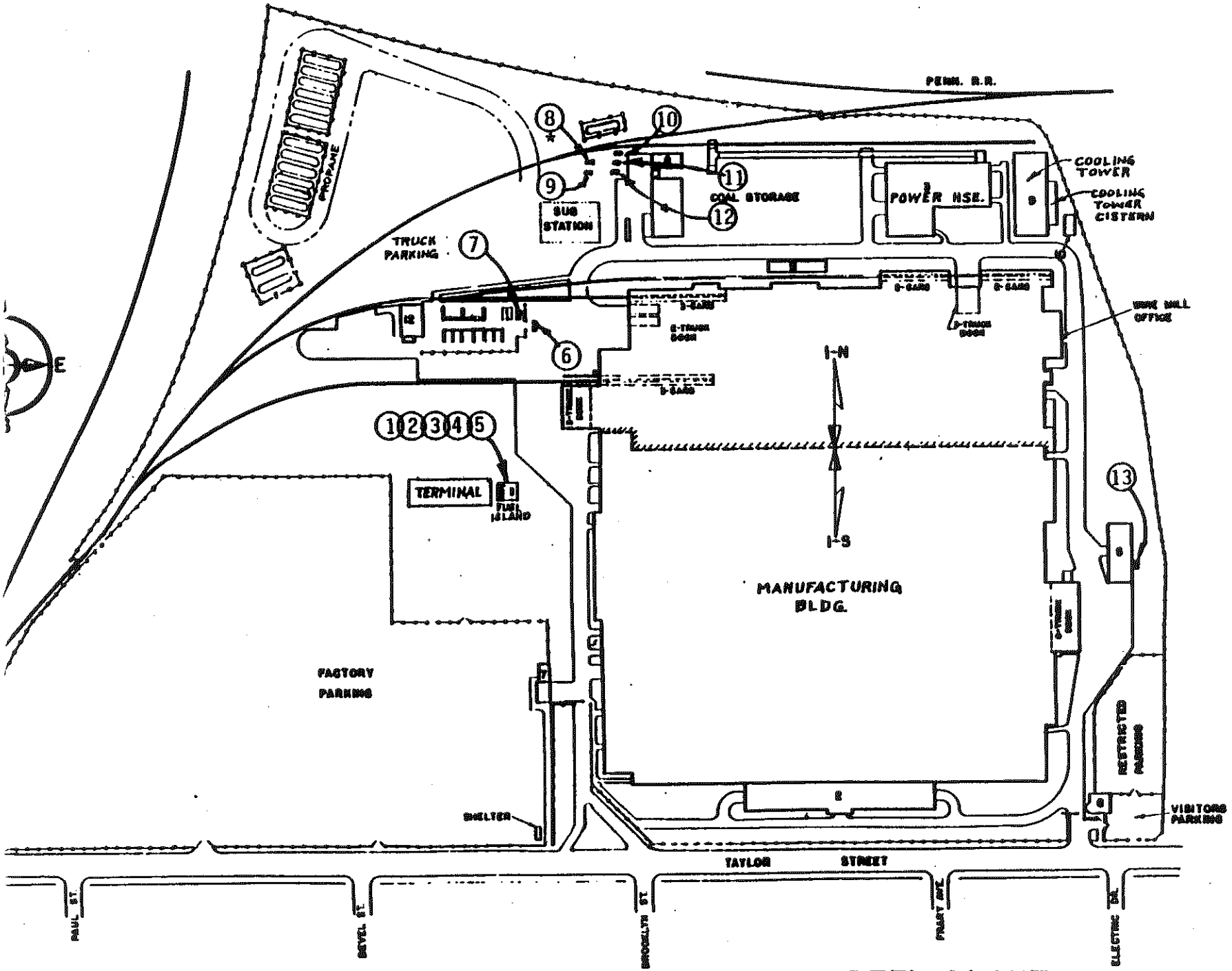
	Tank No. 1	Tank No. 2	Tank No. 3	Tank No. 4	Tank No. 5
Identification No. (e.g., ABC-123), or Facility Assigned Sequential Number (e.g., 1,2,3...)					
1. Status of Tank (Mark all that apply ☒) — Currently in Use	X	X	X	X	X
Temporarily Out of Use					
Permanently Out of Use					
Brought into Use after 5/8/88					
2. Estimated Age (Years)	12	12	12	12	12
3. Estimated Total Capacity (Gallons)	10 000	10 000	10 000	10 000	1000
4. Material of Construction (Mark one ☒) — Steel	X	X	X	X	X
Concrete					
Fiberglass Reinforced Plastic					
Unknown					
Other, Please Specify					
5. Internal Protection (Mark all that apply ☒) — Cathodic Protection					
Interior Lining (e.g., epoxy resins)					
None					
Unknown	X	X	X	X	X
Other, Please Specify					
6. External Protection (Mark all that apply ☒) — Cathodic Protection					
Painted (e.g., asphaltic)	X	X	X	X	X
Fiberglass Reinforced Plastic Coated					
None					
Unknown					
Other, Please Specify					
7. Piping (Mark all that apply ☒) — Bare Steel					
Galvanized Steel	X	X	X	X	X
Fiberglass Reinforced Plastic					
Cathodically Protected					
Unknown					
Other, Please Specify					
8. Substance Currently or Last Stored in Greatest Quantity by Volume (Mark all that apply ☒) — a. Empty					
b. Petroleum					
Diesel	X	X	X		
Kerosene					
Gasoline (including alcohol blends)				X	
Used Oil					
Other, Please Specify					New Oil
c. Hazardous Substance					
Please Indicate Name of Principal CERCLA Substance OR Chemical Abstract Service (CAS) No.					
Mark box ☒ if tank stores a mixture of substances					
d. Unknown					
Additional Information (for tanks permanently taken out of service) a. Estimated date last used (mo/yr)	/	/	/	/	/
b. Estimated quantity of substance remaining (gal.)					
c. Mark box ☒ if tank was filled with inert material (e.g., sand, concrete)					

VI. DESCRIPTION OF UNDERGROUND STORAGE TANKS (Complete for each tank at this location)

Tank Identification No. (e.g., ABC-123), or Arbitrarily Assigned Sequential Number (e.g., 1,2,3...)	Tank No. 6	Tank No. 7	Tank No. 8	Tank No. 9	Tank No. 10
1. Status of Tank (Mark all that apply ☒)					
Currently in Use	☐	☒	☐	☐	☐
Temporarily Out of Use	☐	☐	☐	☐	☐
Permanently Out of Use	☒	☐	☒	☒	☒
Brought into Use after 5/8/86	☐	☐	☐	☐	☐
2. Estimated Age (Years)	40	10	44	44	44
3. Estimated Total Capacity (Gallons)	1000	1000	12 350	10 250	15 000
4. Material of Construction (Mark one ☒)					
Steel	☐	☒	☒	☒	☒
Concrete	☐	☐	☐	☐	☐
Fiberglass Reinforced Plastic	☐	☐	☐	☐	☐
Unknown	☒	☐	☐	☐	☐
Other, Please Specify					
5. Internal Protection (Mark all that apply ☒)					
Cathodic Protection	☐	☐	☐	☐	☐
Interior Lining (e.g., epoxy resins)	☐	☐	☐	☐	☐
None	☐	☐	☐	☐	☐
Unknown	☒	☒	☒	☒	☒
Other, Please Specify					
6. External Protection (Mark all that apply ☒)					
Cathodic Protection	☐	☐	☐	☐	☐
Painted (e.g., asphaltic)	☐	☒	☐	☐	☐
Fiberglass Reinforced Plastic Coated	☐	☐	☐	☐	☐
None	☐	☐	☐	☐	☐
Unknown	☒	☐	☒	☒	☒
Other, Please Specify					
7. Piping (Mark all that apply ☒)					
Bare Steel	☐	☐	☐	☐	☐
Galvanized Steel	☐	☐	☐	☐	☐
Fiberglass Reinforced Plastic	☐	☒	☐	☐	☐
Cathodically Protected	☐	☐	☐	☐	☐
Unknown	☒	☐	☒	☒	☒
Other, Please Specify					
8. Substance Currently or Last Stored in Greatest Quantity by Volume (Mark all that apply ☒)					
a. Empty	☐	☐	☒	☒	☒
b. Petroleum					
Diesel	☐	☐	☐	☐	☐
Kerosene	☐	☐	☒	☐	☐
Gasoline (including alcohol blends)	☐	☐	☐	☐	☐
Used Oil	☒	☒	☐	☐	☐
Other, Please Specify				Xylene	New oil
c. Hazardous Substance	☐	☐	☐	☐	☐
Please Indicate Name of Principal CERCLA Substance OR Chemical Abstract Service (CAS) No.					
Mark box ☒ if tank stores a mixture of substances	☐	☐	☐	☐	☐
d. Unknown	☐	☐	☐	☐	☐
9. Additional Information (for tanks permanently taken out of service)					
a. Estimated date last used (mo/yr)	6 / 75	/	5 / 82	5 / 82	5 / 82
b. Estimated quantity of substance remaining (gal.)	600		0	0	0
c. Mark box ☒ if tank was filled with inert material (e.g., sand, concrete)	☐	☐	☐	☐	☐

VI. DESCRIPTION OF UNDERGROUND STORAGE TANKS (Complete for each tank at this location)

Tank Identification No. (e.g., ABC-123), or Arbitrarily Assigned Sequential Number (e.g., 1,2,3...)	Tank No. 11	Tank No. 12	Tank No. 13	Tank No.	Tank No.
1. Status of Tank (Mark all that apply ☒)					
Currently in Use					
Temporarily Out of Use					
Permanently Out of Use	X	X	X		
Brought into Use after 5/8/86					
2. Estimated Age (Years)	44	44	44		
3. Estimated Total Capacity (Gallons)	15 000	15 000	150		
4. Material of Construction (Mark one ☒)					
Steel	X	X	X		
Concrete					
Fiberglass Reinforced Plastic					
Unknown					
Other, Please Specify					
5. Internal Protection (Mark all that apply ☒)					
Cathodic Protection					
Interior Lining (e.g., epoxy resins)					
None					
Unknown	X	X	X		
Other, Please Specify					
6. External Protection (Mark all that apply ☒)					
Cathodic Protection					
Painted (e.g., asphaltic)					
Fiberglass Reinforced Plastic Coated					
None					
Unknown	X	X	X		
Other, Please Specify					
7. Piping (Mark all that apply ☒)					
Bare Steel					
Galvanized Steel					
Fiberglass Reinforced Plastic					
Cathodically Protected					
Unknown	X	X	X		
Other, Please Specify					
8. Substance Currently or Last Stored in Greatest Quantity by Volume (Mark all that apply ☒)					
a. Empty	X	X			
b. Petroleum					
Diesel					
Kerosene					
Gasoline (including alcohol blends)					
Used Oil					
Other, Please Specify	New Oil	New Oil			
c. Hazardous Substance					
Please Indicate Name of Principal CERCLA Substance OR Chemical Abstract Service (CAS) No.					
Mark box ☒ if tank stores a mixture of substances					
d. Unknown					
9. Additional Information (for tanks permanently taken out of service)					
a. Estimated date last used (mo/yr)	5 / 82	5 / 82	6 / 84	/	/
b. Estimated quantity of substance remaining (gal.)					



GENERAL ELECTRIC COMPANY— TAYLOR STREET PLANT

TANK NUMBERS ARE CIRCLED